



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029



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Via Overnight Mail

August 19, 2003

Phillip L. Hinerman, Esq.
Fox, Rothschild, O'Brien & Frankel, LLP
2000 Market Street
Tenth Floor
Philadelphia, PA 19103-3291

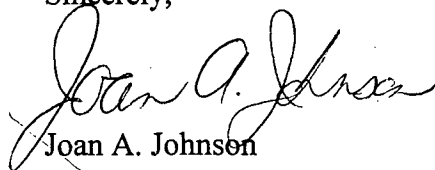
RE: Malvern TCE Superfund Site

Dear Phil:

Enclosed for your review kindly find a copy of a third round *de minimis* settlement offer that is being mailed today by EPA to various Site *de minimis* parties (see letter Enclosure "A" for a list of *de minimis* offerees. The settlement offer package includes a proposed Administrative Order on Consent for *De Minimis* Settlement, Docket No. CERC-03-2003-0041.

Please do not hesitate to contact me if you have any questions.

Sincerely,


Joan A. Johnson

enc.





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

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Via Overnight Mail

August 19, 2003

Steven J. Lemon, Esq.
Jones Lemon Graham & Clancy
223 East Sate Street
P.O. Box 805
Geneva, Illinois 60134-0805

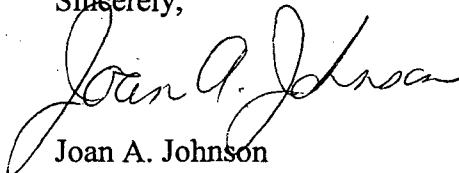
Re: Malvern TCE Superfund Site

Dear Steve:

In follow-up to our telephone conversation today, enclosed for your review kindly find a copy of a third round *de minimis* settlement offer that is being mailed today by EPA to various Site *de minimis* parties (see letter Enclosure "A" for a list of *de minimis* offerees. The settlement offer package includes a proposed Administrative Order on Consent for *De Minimis* Settlement, Docket No. CERC-03-2003-0041.

Please do not hesitate to contact me if you have any questions.

Sincerely,


Joan A. Johnson

enc.



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August 19, 2003

Via Overnight Mail

Larry D. Silver, Esq.
Mark Stevens, Esq.
Cynthia Weiss, Esq.
Langsam, Stevens & Silver
1616 Walnut Street, Suite 1700
Philadelphia, PA 19103

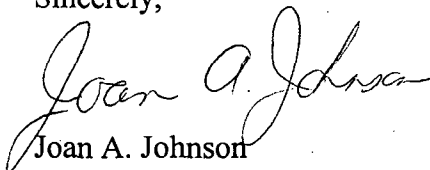
Re: Malvern TCE Superfund Site ("Site")

Dear Larry, Mark, and Cynthia:

In follow-up to my telephone conversation with Cynthia, enclosed for your review kindly find a copy of a third round *de minimis* settlement offer that is being mailed today by EPA to various Site *de minimis* parties (see letter Enclosure "A" for a list of *de minimis* offerees. The settlement offer package includes a proposed Administrative Order on Consent for *De Minimis* Settlement, Docket No. CERC-03-2003-0041.

Please do not hesitate to contact me if you have any questions.

Sincerely,


Joan A. Johnson

Enc.



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REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

AUG 18 2003

To: Addressees

Re: Malvern TCE Superfund Site
**Notice of Potential Liability and
Opportunity to Participate in Third Round *De Minimis* Settlement**

Dear Sir or Madam:

The purpose of this letter is to provide you¹ with an opportunity to participate in a third round *de minimis* settlement, Administrative Order on Consent for *De Minimis* Settlement, Docket No. CERC-03-2003-0041 ("AOC III"), relating to the Malvern TCE Superfund Site ("Site"). This settlement is offered by the United States Environmental Protection Agency ("EPA") under the *de minimis* settlement provisions of CERCLA, including Section 122(g), 42 U.S.C. § 9622(g).

This letter also: (1) shall provide you with information concerning recent cleanup efforts at the Site; (2) notify you that your company may be potentially liable for contamination at the Site pursuant to Section 107(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. § 9607(a); and (3) inform you of future steps in the settlement process. A list of recipients of this AOC III *De Minimis* offer letter is attached as Enclosure "A."

1. ***Site Background***

CERCLA, more commonly known as Superfund, has several key objectives including setting priorities for cleanup of the worst hazardous sites in the country, and, determining the parties potentially responsible for investigating, cleaning up or paying the costs of cleaning up such hazardous sites. These parties are referred to as "potentially responsible parties" or "PRPs."

On October 14, 1992, the United States Environmental Protection Agency ("EPA") included the Site on the National Priorities List ("NPL"), a list of the most serious uncontrolled or abandoned sites at which releases of hazardous substances have occurred or may occur. For a more detailed discussion of the Site background, please see Enclosure "B."

¹ For the purposes of this letter, the term "you" shall refer to either an individual, a company, a partnership, a sole proprietorship, a corporation, and/or the successors, assigns, or heirs of any of the aforementioned legal entities, whichever is applicable.

Customer Service Hotline: 1-800-438-2474

2. *Notice of Potential Liability*

Some recipients of this letter may have previously received a notice advising them of their potential liability regarding the Site. Other recipients of this letter may not have previously received a notice advising them of their potential liability with respect to the Site. This letter shall serve as notification of your potential liability to the extent that such notice has not been previously provided.

For each recipient of this letter that has not previously received a notice of liability, EPA has enclosed (Enclosure "G") Site documents that refer to transactions of each such recipient with the Site. EPA has evaluated this information and has determined that you may be a PRP for this Site. PRPs under CERCLA include: 1) current owners and operators of the site; 2) owners and operators of the site at the time hazardous substances were disposed; 3) persons who arranged for disposal or treatment of hazardous substances sent to the site; and 4) persons who accepted hazardous substances for transport to the site, and who selected the site for disposal. These categories are set forth in Section 107 of CERCLA, 42 U.S.C. § 9607.

EPA has documented the release or threatened release of hazardous substances, pollutants or contaminants at or from the Site, as those terms are defined in Sections 101(14) and 101(33) of CERCLA, 42 U.S.C. §§ 9601(14) and (33). EPA has spent, or is considering spending, public funds on actions to investigate and control such releases or threatened releases at the Site.

EPA may order PRPs, or any one of them, to perform response actions deemed necessary by EPA to protect the public health, welfare or the environment. Additionally, PRPs may be liable for all costs incurred by the government in responding to any release or threatened release at the Site, under Sections 104 and 107(a) of CERCLA, 42 U.S.C. §§ 9604 and 9607(a), and the Resource Conservation and Recovery Act, as amended, 42 U.S.C. §§ 6901 *et seq.*, and other laws. Such actions and costs may include, but are not limited to, conducting a Remedial Design/Remedial Action, and other investigation, planning, response, oversight, and enforcement activities related to the Site. Such persons may also be liable to other persons who have spent their own money performing cleanup actions at the Site. In addition, PRPs may be required to pay for damages for injury to, destruction of, or loss of natural resources, including the cost of assessing the amount or extent of such damages related to a site. Each responsible party may be jointly and severally liable for the entire cost of cleanup.

You should also be aware that once a site is placed on the NPL pursuant to Section 105 of CERCLA, 42 U.S.C. § 9605, it cannot be deleted until after a Remedial Investigation/Feasibility Study has been completed and the necessary remedial action has been conducted in accordance with EPA guidance and the National Contingency Plan, published at 40 C.F.R. Part 300.

By this letter, EPA notifies you of your potential liability with regard to this matter and encourages you to perform or to finance voluntarily those response activities that EPA determines to be necessary at the Site.

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1. ***"De Minimis" Settlements***

This letter also serves as notice to all parties listed on Enclosure "A" ("AOC III De Minimis Settlement Offerees") of the opportunity to participate in a *de minimis* settlement with EPA in connection with the Site. Based on EPA's review of the records pertaining to the Site, you appear to be responsible for a relatively small amount of hazardous substances at the Site. Therefore, you are being offered this opportunity to settle as a *de minimis* party.

Pursuant to CERCLA, 42 U.S.C. § 9601, *et seq.*, EPA has conducted and overseen a number of activities at the Site in response to the release and/or threat of release of hazardous substances, pollutants, and/or contaminants into the environment, described above and in Enclosure "B."

Under Section 122(g) of CERCLA, EPA may offer special settlements to *de minimis* PRPs. Any party who settles its liability to the United States pursuant to this *de minimis* settlement will not be required to perform Site cleanup work. Instead, the *de minimis* settlor will pay an amount calculated by EPA to represent that party's proportionate share of costs already incurred and to be incurred at the Site, plus a premium, which accounts for, among other things, uncertainties in the costs of work not yet performed. In exchange for this cash payment, EPA will agree not to sue or take other civil action against the *de minimis* settlor with regard to this Site and will provide the *de minimis* settlor with contribution protection (see discussion in Section 3.B.3), subject to the settlor's compliance with the terms of the settlement.

EPA previously entered into two *de minimis* settlements relating to the Site. EPA entered in an Administrative Order on Consent for De Minimis Settlement, Docket No. III-98-074-DC ("AOC I") with 150 *de minimis* parties, effective on September 28, 1999, in connection with the Site. EPA entered into Administrative Order on Consent for De Minimis Settlement, Docket No. III-CERCLA- 03-2001-0381 ("AOC II") with nine *de minimis* parties, effective June 11, 2002.

The enclosed third Administrative Order by Consent for *De Minimis* Settlement, Docket No. CERC-03-2003-0041 ("AOC III") (Enclosure "C") sets forth the terms for concluding your liability to the United States for response costs incurred or to be incurred under CERCLA. EPA has released this AOC III for your signature. This opportunity to settle under the terms described herein is being offered for a limited time. **EPA will accept your signature on the AOC III through close of business September 10, 2003.**

In order to assist you in your review of the specific terms of the Malvern TCE Superfund Site *de minimis* settlement offer, the following information is provided:

A. **De Minimis Settlement Eligibility**

1. **Small Waste Contributors**

PRPs may be eligible for *de minimis* settlements if such parties contributed a minimal amount of hazardous substances, in comparison to other hazardous substances at the Site.

In addition, the toxicity or other hazardous effects of the hazardous substances contributed by a PRP to the Site must not be significantly greater than that of other hazardous substances at the Site.

2. Volumetric Ranking Summary

Small waste contributors eligible for *de minimis* settlement have been identified by EPA by utilizing volumetric ranking summaries prepared for the Site. EPA has prepared a volumetric ranking summary, dated July 29, 2003 ("AOC III VRS"), setting forth waste-in and *de minimis* payment amounts for proposed AOC III PRPs, for use in connection with this proposed AOC III. For ease of reference, the AOC III VRS (which is Appendix "D" of the AOC III) is attached as Enclosure "D." Similarly, EPA prepared volumetric ranking summaries for use in connection with AOC I and AOC II.² AOC I VRS and AOC II VRS are attached to the AOC III (Enclosure "C" of this letter) as Appendices "C-1" and "C-2."

The volumetric ranking summaries, AOC I VRS, AOC II VRS, AOC III VRS, prepared by EPA for the Site were compiled using comprehensive Site documents, including invoices, bills of lading, shipping orders and manifests, obtained by EPA from Chemclene. See Enclosure "E," "Malvern TCE Volumetric Ranking Summaries Overview and Methodology" ("VRS Overview and Methodology") and "VRS Explanation Sheet," for additional general information as to the methodology utilized and information contained in the summaries.

EPA has utilized the methodology described in Enclosure "E" when preparing AOC I VRS, AOC II VRS, and AOC III VRS.

The AOC III VRS provides, for each AOC III PRP, waste-in volume and percentage information for both the MPA and the FDA at the Site. Since all PRP waste into the Site was received and processed by Chemclene in the MPA, EPA has set the *de minimis* settlement eligibility cut-off at or less than .75% of the total MPA waste volume. Generator PRPs should refer to Generator Total Payment column in order to determine their total settlement payment. Broker/Transporter PRPs should refer both to the Generator Total Payment and the Broker/Transporter Payment, to the extent applicable, columns to determine their total settlement payment.

In accordance with the Small Business Liability Relief and Brownfields Revitalization Act, Public Law 107-118 ("Brownfields Act"), enacted in January 2002, parties that contributed less than 2 drums to the Site will be considered *de micromis* parties. The Brownfields Act provides for a limitation of liability for *de micromis* parties.

² Volumetric Ranking Summaries dated December 16, 1998 ("AOC I VRS") were utilized by EPA in connection with AOC I. Volumetric Ranking Summaries dated May 29, 2001 ("AOC II VRS") were utilized by EPA in connection with AOC II.

Based on on-going research and attempts to identify viable PRPs, additional parties have been identified as orphans for purposes of the third *de minimis* settlement. In addition, EPA's past costs at this Site have increased and are reflected in the AOC III VRS. The basic methodology for calculating the *de minimis* payments has not changed.

B. De Minimis Settlement Terms

1. De Minimis Settlement Payment

In order to participate in this settlement, each AOC III PRP must agree to pay the amount listed next to its company in the "Total *De Minimis* Payment" column on the AOC III VRS (Enclosure "D").

The total payment amount represents each AOC III PRP's FDA and MPA percentage contribution towards past costs incurred by EPA at the Site and estimated future costs to clean up the Site, plus a premium payment.

For purposes of this settlement offer, EPA has estimated that the total response costs incurred and to be incurred at or in connection with the Site by the EPA Superfund and by private parties is \$21,697,339.80. This amount includes \$5,302,459.63 in response costs incurred by EPA through June 25, 2002, \$359,739.17 in response costs incurred by DOJ through May 3, 2003, \$811,961.00 in response costs incurred by the RD/RA Consent Decree PRPs in completing installation of a public water supply, as required by the RD/RA Consent Decree, and Future Response Costs in the amount of \$15,223,180.00 (estimated future Site remedial costs in the amount of \$15,023,180.00, and EPA future remedial oversight costs estimated to be \$200,000.00).

The premium payment is determined based upon a variety of factors specific to both the Site and the settlement. EPA has utilized a one hundred twenty-five percent (125%) premium for any AOC III PRPs that did not receive from EPA an offer to participate in AOC I. EPA has utilized a two hundred twenty-five percent (225%) premium for any AOC III PRPs that received from EPA an offer to participate in AOC I, but failed to participate in that settlement.

In order to determine an AOC III PRP's total *de minimis* settlement payment, EPA has divided costs associated with the FDA and the MPA and calculated total payment amounts for each of these areas.

EPA is in the process of reviewing information concerning the selected remedy for the Site, and in particular, for soil remediation at the FDA and groundwater remediation at the MPA. This review could have the effect of altering the selected remedy at the Site and of subsequently lowering or raising the projected future costs at the Site. Future changes to the remedy and consequential changes to the projected future costs associated with the Site, will have no effect on this settlement offer, except to the extent that total remedial costs exceed \$31.2 million. In the event remedial costs do exceed \$31.2 million, EPA has provided for a reopener of liability provision.

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2. Covenant Not to Sue

EPA will provide each AOC III PRP with a covenant not to sue. This provision is a promise that EPA will not bring any future legal actions against you regarding the Site and the specific matters identified by the settlement, provided that EPA's information regarding the volume and toxicity of your wastes is correct.

3. Contribution Protection

EPA will provide each settling AOC III PRP with contribution protection. This provision offers you protection from being sued by other PRPs at the Site. Frequently, major waste contributors will sue small waste contributors to recover clean up costs. A *de minimis* settlement provides protection from such suits that extends to all issues covered by the settlement.

C. Information to Assist PRPs

1. Information about the Site

In addition to the information contained in this letter, key documents about the Site are available for your review at EPA's website www.epa.gov/arweb.

2. Other De Minimis Parties

In connection with the Site *de minimis* settlements, EPA is aware of the following who has served as a *de minimis* PRP representative:

Philip L. Hinerman, Esq.
Fox, Rothchild, O'Brien & Frankel, LLP
200 Market Street
Philadelphia, PA 19103-3291
(215) 299-2000

3. Other Site PRPs

EPA has identified PRPs at the Site that EPA has determined are not eligible for *de minimis* settlement and to whom this AOC III settlement offer has not been extended. These PRPs are those with an MPA % of greater than .75%. An address list, reflecting the names and addresses of all Site PRPs, including both *de minimis* and those not eligible for *de minimis* settlement, is attached (Attachment "F").

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D. Form of the Settlement

This settlement offer is extended only to the addressees of this letter. **EPA will accept your signature on the AOC III through close of business September 10, 2003.** Executed signature pages may be sent to the following:

Joan A. Johnson, Sr. Assistant Regional Counsel (3RC41)
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

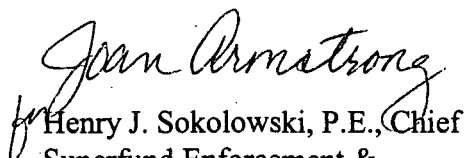
Once the parties have signed the AOC III, there will be a public comment period pursuant to Section 122(i) of CERCLA, 42 U.S.C. § 9622(i). In accordance with Section 122(i)(3) of CERCLA, 42 U.S.C. § 9622(i)(3), EPA may withdraw its consent to the AOC III if comments received disclose facts or considerations that indicate that the AOC III is inappropriate, improper, or inadequate. If the comments received do not require modification of, or EPA withdrawal from, the AOC III, the effective date of the AOC III shall be the date upon which EPA issues written notice to the AOC III PRPs/Settlers.

If you already are involved in discussions with State or local authorities, engaged in voluntary action, or involved in a lawsuit regarding this Site, you should not interpret this letter as advising or directing you to restrict or to discontinue any such activities. You should, however, report the status of those discussions or activities in your letter to EPA. The factual and legal discussions contained in this letter are intended solely for notification and information purposes. They are not intended to be, and cannot be relied upon, as a final EPA position on any matter set forth herein.

EPA has determined that some of the companies receiving this letter may be small businesses under the Small Business Regulatory Enforcement and Fairness Act ("SBREFA"). Please see Enclosure "H" to this letter. This information has been provided for informational purposes only pursuant to EPA policy, and is not intended to influence any PRP's decision to enter into settlement negotiations pursuant to this letter.

If you have any questions relating to the foregoing, you may call Patrick Egan, Civil Investigator, at (215) 814-3167.

Sincerely,


for Henry J. Sokolowski, P.E., Chief
Superfund Enforcement &
Federal Facilities Branch

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Enclosures:

Enclosure A - AOC III De Minimis Settlement Offerees

Enclosure B - Site Background

Enclosure C - AOC III, with the following Appendices:

Appendix A - List of AOC III PRPs/Settlors

Appendix B - Site Map

Appendix C-1 - AOC I VRS

Appendix C-2 - AOC II VRS

Appendix D - AOC III VRS

Enclosure D - AOC III VRS

Enclosure E - Volumetric Ranking Summaries Overview and Methodology

Enclosure F - Comprehensive Mailing List

Enclosure G - Site Documents

Comprehensive Transaction Reports

**Enclosure H - Small Business Regulatory and Enforcement Fairness Act Information
Sheet**

**cc: Patrick Egan (3HS11)
Joan A. Johnson (3RC41)
Charlie Root (3HS21)
Mark Stevens, Esq. (Chemclene Site Defense Group)**

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Enclosure A
AOC III De Minimis Settlement Offerees

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ENCLOSURE A
AOC III De Minimis Settlement Offerees

Accuracy Scientific Instruments Inc.
Airline Hydraulics Corporation
Allister Manufacturing Co.
Ametek, Inc.
Amp Corporation
Ark Products Co., Inc.
Athena Controls, Inc.
Bishop Tube Co.
C.K. Systematics, Inc.
Camdel Metals Inc.
Carvel Hall Inc. c/o Syrattech
Chem Solv Inc.
Contamination Control, Inc.
David K. Robson, Inc.
E. Frank Hopkins Co.
Emeco Industries, Inc.
Fabric Development, Inc.
Fairfax Cleaners
Fergusson Solvents Company
Frazer-Volpe Corporation
FTC Hazardous, Inc.
G.K. Garrett Corporation
Glah Brothers, Inc.
Gulf & Western Industries, Inc.
High Energy Corporation
Hulltronics, Inc.
J&J Spill Services & Supplies, Inc.
Keystone Transformer
Kosempel Manufacturing Company
Leeds & Northrup Company
Lightman Drum Co., Inc.
Malco Inc.
Matheson Instruments
McClarin Plastics, Inc.
Model Finishing Co., Inc.
Narco Avionics, Inc.
National Metalcrafters, Inc.
Ni-Chro Finishing Company
Oxford Metal Products Co.
Penn Airborn Product c/o Transicoil
Penske V.D.A.
Philadelphia Steel Drum Co., Inc.

Philco Ford c/o Loral Space Systems, Inc.
Precision Arts Manufacturing, Inc.
Princo Instruments, Inc.
Prodelin Inc.
R. C. Kletzing Inc.
Sermetal Inc.
Shur-Kut Supply Corporation
Solid State Scientific
Storm Weather Products
U.S. Environmental Services Inc.
Waste Consulting & Brokerage Inc.
Xynatech Inc.

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Enclosure B
Site Background

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Enclosure B Site Background

The Malvern TCE Superfund Site ("Site") is located at and near 258 N. Phoenixville Pike, Malvern, East Whiteland Township, Pennsylvania.

From 1952 until 1992, Chemcene Corporation ("Chemcene") sold and reclaimed industrial cleaning solvents, including trichloroethene ("TCE"); 1,1,1-trichloroethane ("1,1,1-TCA"); perchloroethylene ("PCE," also called tetrachloroethene); and methylene chloride ("MEC"). These solvents were used by local industries for degreasing metal parts and other cleaning purposes. Chemcene used a distillation process to remove impurities from the chlorinated solvents. The distilled solvents were then resold to customers for reuse, or resold to other customers. Chemcene utilized two areas of the Site as part of its operations, the Main Plant Area ("MPA") and the Former Disposal Area/Mounded Area ("FDA").

The end products of processing waste solvents are the reclaimed solvents and chlorinated still bottoms. The chlorinated waste solvents are listed hazardous wastes pursuant to the Resource Conservation and Recovery Act ("RCRA") and, therefore, the resulting still bottoms are listed hazardous waste. Prior to 1975, Chemcene reportedly buried drums containing the still bottom sludges from the distillation process in the FDA, approximately 1,900 feet southwest of the main plant. The FDA consists of two unlined earthen pits, each approximately 30 feet by 50 feet by 15 feet deep. This area is currently secured by an 8-foot high chain link fence. The Mounded Area, located on the western edge of the FDA, is approximately 8 feet wide by 150 feet long.

Chemcene's activities at the Site have been linked to the presence of volatile organic compounds ("VOCs") in the ground water and soil at the MPA and the FDA and the groundwater of the adjacent Spring Ridge Property. These contaminants include TCE, PCE, 1,1,1-TCA, MEC, 1,1-DCE, among others, and are listed as hazardous substances under 40 C.F.R. § 302.4.

In the spring of 1980, TCE was detected in groundwater from several wells in the vicinity of the Chemcene facility. At this time, Chemcene began sampling domestic wells in the immediate vicinity of the property. Private domestic wells and on-Site monitoring wells were sampled by Pennsylvania's Department of Environmental Resources, now known as the Department of Environmental Protection, and Chemcene in June 1980 and July 1981. Analytical results revealed contamination of the underlying aquifer with chlorinated ethenes and related compounds. TCE was detected in wells at concentrations up to 12,600 micrograms per liter (" $\mu\text{g/l}$ "), far exceeding the Maximum Contaminant Level ("MCL") of 5.0 $\mu\text{g/l}$. The Site was listed on the Superfund National Priorities List in September 1983. The contaminated home wells were located south of the FDA, with several located in the Hillbrook Circle residential development. Chemcene furnished activated carbon filter units to twenty (20) residential wells within the Hillbrook Circle Development and conducted periodic sampling of home wells in accordance with its Domestic Well Management Plan until November 1994. In February 1995, EPA assumed control of maintenance activities of the carbon filter units and periodic sampling of

the home wells, after it was determined that Chemclene was not following the procedures outlined in its Domestic Well Management Plan. In August 1995, several of the filter systems were upgraded by EPA in response to analytical results from residential well samples that showed contamination was passing through the existing filters into the homes.

In addition to the installation of carbon filters, Chemclene conducted removal actions following the detection of soil and groundwater contamination in 1980. Debris and approximately 300 drums were removed from the FDA excavations, in a prolonged removal effort from 1981 to 1984. Soils underlying the FDA were excavated to a depth of 15 feet and transported for disposal at a RCRA permitted disposal facility. Additional drums were removed from the Mounded Area in late 1990; however, contaminated soil was left in place.

Four underground storage tanks were removed from the MPA in 1986. Soil samples collected from below the excavation grade of the tanks exhibited elevated concentrations of TCE, PCE, and 1,1,1-TCA. In addition, elevated levels of VOCs were detected in soil gas samples collected outside the distillation building in the MPA. These contaminant levels are believed to be related to Chemclene's past practices of discharging contaminated condensate from the recycling distillation process directly onto the ground surface.

As an operating facility, Chemclene entered into a RCRA Corrective Action Order with EPA in 1987. A RCRA Facilities Investigation ("RFI") Work Plan was approved for the Site in 1989. In July 1992, Chemclene withdrew its RCRA Part B Application as a treatment and storage facility, and to EPA's knowledge stopped accepting waste solvents for reclamation.

Chemclene failed to complete the RFI and implement interim corrective measures. As a result, EPA began considering the Site under the Superfund remedial program in November 1993. All existing data was compiled and a report was developed entitled Data Summary Report, April 1995. Based on EPA's review of the existing information, data gaps were identified and EPA was unable to conduct a Human Health or Ecological Risk Assessment. Accordingly, EPA conducted a Remedial Investigation ("RI") to complete the necessary data gathering at the Site. The RI was completed in January 1997. EPA completed a Feasibility Study relating to the Site in June 1997. The Proposed Plan for a comprehensive Site clean up was issued in June 1997. In November 1997, EPA issued a Record of Decision ("ROD") selecting a final remedy for cleanup of the Site. Available information indicates that Chemclene ceased operations in the Fall of 1999.

In April 1998, EPA notified approximately 250 generator and transporter potentially responsible parties ("PRPs") of their eligibility for a potential Superfund *de minimis* settlement regarding the Site. Additionally, in May 1998, EPA issued Special Notice Letters to approximately 40 non-*de minimis* potentially responsible parties which notified them of their opportunity to resolve their liability with respect to the Site.

In May 1999, EPA and 169 *de minimis* parties entered into an Administrative Order on

Consent, which became effective September 28, 1999. In December 1999, the U.S. District Court for the Eastern District of Pennsylvania entered a Remedial Design/Remedial Action Consent Decree ("RD/RA Consent Decree") between EPA and 35 non-*de minimis* parties ("RD/RA Consent Decree PRPs"). Among other things, the RD/RA Consent Decree PRPs agreed to implement the Remedial Design and Remedial Activity specified in the November 1997 ROD. In May 2001, EPA and nine additional *de minimis* parties entered into an Administrative Order on Consent, which became effective June 11, 2002.

In accordance with obligations set forth in the RD/RA Consent Decree, the RD/RA Consent Decree PRPs have commenced response actions at the Site. Among other things, the RD/RA Consent Decree PRPs have provided a public water supply to certain residences located near or adjacent to the Chemclene facility. In addition, the RD/RA Consent Decree PRPs have completed a pre-design investigation of the Site and are commencing remedial design activities.

In December 2002, a number of RD/RA Consent Decree PRPs filed a contribution action (the "Litigation") against a number of Site PRPs, including *de minimis* PRPs that have not entered into any *de minimis* settlements with EPA. The Litigation, Civil Action, No. 02-8964, is pending in the United States District Court for the Eastern District of Pennsylvania. In response to the Litigation, EPA has received requests from a number of *de minimis* defendants seeking to settle their alleged CERCLA liability at the Site.

Appendix D AOC III VRS

Malvern TCE Superfund Site
Explanation Sheet for the Second Round De Minimis Settlement - Volumetric Ranking Summaries

The following provides an explanation of the information provided in the attached Malvern TCE Superfund Site (the Site) New Volumetric Ranking Summary (VRS) for the Second Round De Minimis Settlement. This New VRS for the Second Round De Minimis Settlement supplants the VRS dated 11/30/98 only in reference to the parties eligible for this Second Round De Minimis Settlement.¹

PRP Name = The name of the specific potentially responsible party (PRP).

FDA Drums = The total number of drums sent to the Site by each PRP before August 1, 1975.

FDA % = The total number of drums sent by the PRP to the Site prior to August 1, 1975, divided by the total number of documented drums received by Chemclene prior to August 1, 1975, multiplied by 100.

FDA Revised % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the FDA total number of all non-orphan² drums received by Chemclene Corporation prior to August 1, 1975, multiplied by 100.

FDA Cost = The FDA Revised % divided by 100 and multiplied by \$10,544,199.49, the total past costs³ and estimated future cost associated with the FDA.

FDA Premium = The FDA Revised % divided by 100 and multiplied by future estimated costs for the FDA (\$8,155,725) multiplied by the premium (50% plus an additional 10% for those parties who were offered but declined to participate in the 1999 de minimis settlement).

MPA Drums = The total number of drums sent by each PRP, regardless of the date.

MPA % = The total number of drums sent by the PRP, regardless of date, divided by the total number of documented drums received by Chemclene Corporation, multiplied by 100.

MPA Revised % = The total number of drums sent by the PRP, regardless of date, divided by the total number of non-orphan² drums received by Chemclene Corporation, multiplied by 100.

MPA Cost = MPA Revised % divided by 100 and multiplied by \$9,961,900.49, the total past cost³ and estimated future cost associated with the MPA.

MPA Premium = The MPA Revised %, divided by 100 and multiplied by the future estimated costs for the MPA (\$7,573,426) multiplied by the premium (50% plus an additional 10% for those parties who were offered but declined to participate in the 1999 de minimis settlement).

Total Payment = The sum of the FDA Cost, FDA Premium, MPA Cost, and MPA Premium.

¹ The FDA Cost, FDA Premium, MPA Cost, and MPA Premium figures are rounded to zero decimal places for display purposes only. The full number is used in the calculation of the Total Payment.

² Non-orphan drums are drums for which there was either a viable generator or a viable broker/transporter as of November 30, 1998.

³ The total past cost for the Site as of October 3, 2000 is \$4,776,948.97. Half of this cost was allocated to the FDA, with the other half being allocated to the MPA.

**Malvern TCE Superfund Site
Second Round De Minimis Settlement
Volumetric Ranking Summary
(Alphabetical by PRP)**

PRP Name	FDA Drums	FDA %	FDA Revised %	FDA Cost	FDA Premium	MPA Drums	MPA %	MPA Revised %	MPA Cost	MPA Premium	Total Payment
American Electronics Laboratories						9.00	0.03%	0.03%	\$3,247	\$1,530	\$4,778
Boekel Industries						13.00	0.05%	0.05%	\$4,691	\$2,210	\$6,901
Elco Corporation	61.00	2.67%	2.73%	\$287,692	\$133,514	61.00	0.22%	0.23%	\$22,010	\$10,372	\$453,589
Ervin's Crafts						5.00	0.02%	0.02%	\$1,804	\$850	\$2,654
K- D Tool Manufacturing						95.00	0.34%	0.36%	\$34,278	\$16,153	\$50,432
Maida Development						57.5	0.21%	0.22%	\$20,747	\$9,777	\$30,524
McHugh Railroad Maint. Equip. Co.						4.00	0.01%	0.01%	\$1,443	\$680	\$2,123
Photofabrication Chemical & Equipment						7.19	0.03%	0.03%	\$2,594	\$1,223	\$3,817
R & E Martin						171.29	0.62%	0.64%	\$61,805	\$29,125	\$90,931
Technitrol	10	0.44%	0.45%	\$47,163	\$18,240	10	0.04%	0.04%	\$3,608	\$1,417	\$70,428
Total	71					432.98					\$716,177

ORIGINAL
(Red)

**Malvern TCE Superfund Site
Second De Minimis Settlement
Volumetric Ranking Summary
(Descending)**

PRP Name	FDA Drums	FDA %	FDA Revised %	FDA Cost	FDA Premium	MPA Drums	MPA %	MPA Revised %	MPA Cost	MPA Premium	Total Payment
Elco Corporation	61.00	2.67%	2.73%	\$287,692	\$133,514	61.00	0.22%	0.23%	\$22,010	\$10,372	\$453,589
R & E Martin						171.29	0.62%	0.64%	\$61,805	\$29,125	\$90,931
Technitrol	10.00	0.44%	0.45%	\$47,163	\$18,240	10.00	0.04%	0.04%	\$3,608	\$1,417	\$70,428
K-D Tool Manufacturing Co						95.00	0.34%	0.36%	\$34,278	\$16,153	\$50,432
Maida Development						57.5	0.21%	0.22%	\$20,747	\$9,777	\$30,524
Boekel Industries						13.00	0.05%	0.05%	\$4,691	\$2,210	\$6,901
American Electronics Laboratories						9.00	0.03%	0.03%	\$3,247	\$1,530	\$4,778
Photofabrication Chemical & Equipment						7.19	0.03%	0.03%	\$2,594	\$1,223	\$3,817
Ervins Crafts						5.00	0.02%	0.02%	\$1,804	\$850	\$2,654
McHugh Railroad Maint. Equip. Co.						4.00	0.01%	0.01%	\$1,443	\$680	\$2,123
Total	71					432.98					\$716,177

ORIGINAL
(Red)

Appendix C-2 AOC II VRS

174032

Malvern TCE Superfund Site
Explanation Sheet for the Final Volumetric Ranking Summary (VRS)

The following provides an explanation of the information provided in the attached Malvern TCE Superfund Site (the Site) Final Volumetric Ranking Summary (VRS). Please refer to the example provided below for an illustration of the process used to calculate individual total payment.¹

PRP Name	FDA Drums	FDA %	FDA Revised %	FDA Cost	FDA Premium	MPA Drums	MPA %	MPA Revised %	MPA Cost	MPA Premium	Total Payment
ABC Corporation	34	1.49 %	1.52 %	\$141,249	\$62,182	82	0.29 %	0.30 %	\$26,325	\$11,483	\$241,239

PRP Name = The name of the specific potentially responsible party (PRP). Subsidiaries may be listed separately from parent companies; therefore, please review the VRS in its entirety to identify company subsidiaries that may have done business with Chemclene Corporation.

FDA Drums = The total number for drums sent to the Site before August 1, 1975.

FDA % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the total number of documented drums received by Chemclene Corporation prior to August 1, 1975, multiplied by 100.

FDA Revised % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the FDA total number of all non-orphan² drums received by Chemclene Corporation prior to August 1, 1975, multiplied by 100.

FDA Cost = The FDA Revised % divided by 100 and multiplied by \$9,263,078, the total past cost³ and estimated future cost associated with the FDA.

FDA Premium = The FDA Revised % divided by 100 and multiplied by the future estimated costs for the FDA (\$8,155,725) multiplied by the premium (50%).

MPA Drums = The total number of drums received at the Site, regardless of the date, for which the PRP is responsible.

MPA % = The total number of drums sent by the PRP, regardless of date, divided by the total number of documented drums received by Chemclene Corporation, multiplied by 100.

MPA Revised % = The total number of drums sent by the PRP, regardless of date, divided by the total number of non-orphan drums² received by Chemclene Corporation, regardless of date, multiplied by 100.

MPA Cost = MPA Revised % divided by 100 and multiplied by \$8,680,799, the total past cost³ and estimated future cost associated with the MPA.

MPA Premium = The MPA Revised % divided by 100 and multiplied by the future estimated costs for the MPA (\$7,573,426) multiplied by the premium (50%).

Total Payment = FDA Cost + FDA Premium + MPA Cost + MPA Premium.

¹ The FDA Cost, FDA Premium, MPA Cost, and MPA Premium figures are rounded to zero decimal places for display purposes only. The full number is used in the calculation of the Total Payment.

² Non-orphan drums are drums for which there is either a viable generator or a viable broker/transporter.

³ The total past cost for the Site as of June 17, 1997, is \$2,214,705.00. Half of this cost was allocated to the FDA, with the other half being allocated to the MPA.

AR000211

 174032
 Redd
 7/10/97

11/30/

Malvern TCE Site Fund Site
Generator Volumetric Ranking Summary*
 (By Descending Order)

Page 1 of 1

(Pay)
PENDING

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Western Electric	139.00	6.09%	6.22%			2083.00	7.54%	7.80%			A
Hamilton Technology, Inc.						1234.00	4.47%	4.82%			A
Simon Wrecking Company Inc.	715.51	31.33%	32.00%			983.51	3.58%	3.88%			A
Hamilton Welch Co.	187.00	8.63%	8.81%			904.00	3.27%	3.39%			A
Viz Manufacturing	104.00	4.55%	4.65%			819.84	2.97%	3.07%			A
Flacher & Porter Co/Andrews Glass	93.00	4.07%	4.16%			794.50	2.86%	2.96%			A
Syntex/Star Grouping											
Star Dental Corporation						610.00	2.21%	2.28%			D, A
Plymouth Tube	9.00	0.39%	0.40%			586.37	2.05%	2.12%			A
Armstrong Cork Co.						522.70	1.89%	1.96%			A
Burroughs Corp.	147.00	6.44%	6.58%			519.54	1.86%	1.95%			A
General Motors Corporation	5.00	0.22%	0.22%			517.00	1.87%	1.94%			A
Cyprus Foote Mineral Co.						495.00	1.79%	1.85%			A
Resource Technology Services, Inc.						473.72	1.72%	1.77%			C, A
Hamilton Precision Metals						472.08	1.71%	1.77%			A
Relfy Plating						430.00	1.58%	1.61%			A
LaFrance Corp.	12.00	0.53%	0.54%			415.00	1.50%	1.55%			A
N W Controls	4.00	0.16%	0.18%			374.59	1.36%	1.40%			A
Sunroc Corp.	52.00	2.26%	2.33%			358.00	1.30%	1.34%			A
Morning Call						355.00	1.29%	1.33%			A
Delbar Products						328.50	1.19%	1.23%			A
USG Grouping											
Donn Corporation						292.00	1.06%	1.09%			D, A

* Superseding 4/27/98 VRS

A De minimis party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary.

E De minimis party.

AR000212

11/30/98

Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
 (By Descending Order)

Page 2 of 16

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Kim Manufacturing						283.00	1.03%	1.06%			A
ALCOA	40.00	1.75%	1.79%			275.00	1.00%	1.03%			A
Quaker City Chemicals	7.00	0.31%	0.31%			268.09	0.97%	1.00%			C, A
P P & L Northern Div. S.C.						257.27	0.93%	0.96%			A
Aydin						251.82	0.91%	0.94%			A
Beckell Corporation						250.55	0.91%	0.94%			A
A. S. Koch Corp.	137.00	6.00%	6.13%			250.00	0.91%	0.94%			A
Vishay Resistive Systems						241.00	0.87%	0.90%			A
Handy & Harman Tube Co. Inc						229.18	0.83%	0.86%			A
Porter Instruments						228.27	0.83%	0.85%			A
Electronic Display Systems/Hercules						224.00	0.81%	0.84%			A
Action Manufacturing Company	49.18	2.15%	2.20%			220.31	0.80%	0.83%			A
Cabot Grouping											
Kaweco Beryco						218.00	0.79%	0.82%			D, A
John Evan's & Sons, Inc.						203.29	0.74%	0.76%	\$66,069	\$26,829	\$94,918
Defense Reutilization & Marketing Grouping											
DRMS/PNSY						200.72	0.73%	0.75%			D, A
Electro Platers of York Inc.						199.36	0.72%	0.75%	\$64,811	\$26,272	\$93,083
McClarin Plastics						195.04	0.71%	0.73%	\$63,407	\$27,659	\$91,066
General Electric						191.00	0.69%	0.72%	\$62,094	\$27,088	\$89,180
Lavelle Aircraft Co.						189.55	0.69%	0.71%	\$61,822	\$26,881	\$88,503
Polyacelcones						184.00	0.67%	0.69%	\$59,818	\$26,094	\$85,912

* Superseding 4/27/98 VRS

A De minimis party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If your party appears under a grouping, please refer to the combined entities throughout the Malvern TCE Superfund Site Volumetric Ranking Summary.

E De minimis party.

AR000213

ORIGINAL
(Red)

11/30/88

**Malvern TCE Superfund Site
Generator Volumetric Ranking Summary***
(By Descending Order)

Page 3 of 3

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
USG Grouping											
USG Interiors						182.00	0.66%	0.66%			D, A
RCA	32.00	1.40%	1.43%	\$132,584	\$58,367	177.00	0.64%	0.60%	\$57,542	\$25,101	\$273,594
SPS Technologies						167.00	0.60%	0.63%	\$54,291	\$23,683	\$77,974
National Solvents Inc.						156.00	0.57%	0.60%	\$0	\$0	B
H - V Industries, Inc.						151.50	0.55%	0.57%	\$49,252	\$21,465	\$70,737
Leeds & Northrup						145.72	0.53%	0.55%	\$47,373	\$20,665	\$68,038
NGK Metals						145.00	0.53%	0.54%	\$47,139	\$20,563	\$67,702
Cabot Grouping											
Cabot Berylo						143.00	0.52%	0.54%			D, A
Stein Seal Co.						138.00	0.50%	0.52%	\$44,863	\$19,570	\$64,434
S K F Industries Inc.						133.36	0.46%	0.50%	\$43,355	\$18,912	\$62,267
Amp Corp.	34.00	1.49%	1.52%	\$140,870	\$62,015	133.00	0.46%	0.50%	\$43,238	\$18,861	\$264,984
Bishop Tube Co.	60.00	2.63%	2.68%	\$248,594	\$109,438	130.00	0.47%	0.49%	\$42,263	\$18,436	\$418,731
F B F Industries Inc.						130.00	0.47%	0.49%	\$42,263	\$18,436	\$60,696
Panfex Inc.	42.00	1.84%	1.88%	\$174,016	\$76,807	125.31	0.45%	0.47%	\$40,736	\$17,771	\$308,131
Valley Forge Tape & Label Co.						122.36	0.44%	0.46%	\$39,779	\$17,352	\$57,131
Dorado Fabrics						119.00	0.43%	0.00%	\$0	\$0	B
Penguin Industries						119.00	0.43%	0.45%	\$38,687	\$16,876	\$55,562
R & E Martin, Inc.						116.29	0.42%	0.44%			C
Syntex/Star Grouping											
Syntex Dental Products						115.00	0.42%	0.43%			D, A
James Spring & Wire Co.	2.00	0.09%	0.09%	\$8,266	\$3,648	113.00	0.41%	0.42%	\$36,736	\$16,025	\$64,695

* Superseding 4/27/88 VRS

A De minimis party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary.

E De minimis party.

AR000214

Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Giles & Ransome						112.00	0.41%	0.42%	\$36,411	\$15,883	\$52,294
Mars Electronics Inc.						110.99	0.40%	0.42%	\$36,083	\$15,740	\$51,822
Netzach Inc.						110.00	0.40%	0.41%	\$35,781	\$15,560	\$51,360
Waste Conversion						104.00	0.38%	0.39%			C
Empire Abrasive & Equipment Corp.						103.80	0.38%	0.39%	\$33,745	\$14,720	\$48,465
McGee Industries Inc.						97.00	0.35%	0.36%	\$31,534	\$13,756	\$45,290
K - D Tool Manufacturing						95.00	0.34%	0.36%	\$30,884	\$13,472	\$44,357
Malco						94.04	0.34%	0.35%	\$30,572	\$13,336	\$43,908
S P D Technologies						87.00	0.32%	0.33%	\$28,284	\$12,336	\$40,621
Acro Labels						86.00	0.31%	0.32%	\$27,958	\$12,196	\$40,154
J W Rex Co.	21.00	0.92%	0.94%	\$87,008	\$38,303	86.00	0.31%	0.32%	\$27,958	\$12,196	\$165,466
Chobert Associates						85.15	0.31%	0.32%	\$27,682	\$12,075	\$39,757
High Energy Company						84.84	0.31%	0.32%	\$27,516	\$12,003	\$39,519
Container Research Corporation						83.00	0.30%	0.31%	\$26,983	\$11,771	\$38,754
Clifton Precision	34.00	1.49%	1.52%	\$140,870	\$62,015	82.00	0.30%	0.31%	\$26,858	\$11,629	\$241,172
Materials Electronic Products						81.00	0.29%	0.30%	\$26,333	\$11,487	\$37,820
Princo Instruments Inc.						79.00	0.29%	0.30%	\$25,683	\$11,203	\$36,886
Aston-Hill Co.						74.00	0.27%	0.00%	\$0	\$0	B
Defense Reutilization & Marketing Grouping											
DRMO Knox						74.00	0.27%	0.28%			D, A
Moore Products	73.00	3.20%	3.27%	\$302,456	\$133,150	73.00	0.26%	0.27%	\$23,732	\$10,352	\$469,601
Spra-Fin Inc.						72.41	0.26%	0.27%	\$23,540	\$10,269	\$33,809
USG Grouping											
Floor Systems Inc.						71.40	0.26%	0.27%			D, A

* Superseding 4/27/96 VRS

A De minimis party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If you any appears under a grouping, please refer to the combined entities throughout the Malvern TCE Superfund Site Volumetric Ranking Summary.

E De minimis party.

AR000215

ORIGINAL
(Red)

11/30

**Malvern TCE & Fund Site
Generator Volumetric Ranking Summary***
(By Descending Order)

Page 6

(Red)
ORIGINAL

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Superior Tube	21.00	0.92%	0.94%	\$87,008	\$38,303	71.00	0.26%	0.27%	\$23,082	\$10,069	\$158,462
Synthene Taylor Corp.						71.00	0.26%	0.27%	\$23,082	\$10,069	\$33,151
Sandvik, Inc.						70.90	0.26%	0.27%	\$23,049	\$10,055	\$33,104
Amchem						70.00	0.25%	0.26%	\$22,757	\$9,927	\$32,684
Scolco Design Group Inc.						69.00	0.25%	0.26%	\$22,432	\$9,785	\$32,217
Gould Inc.						68.00	0.25%	0.25%	\$22,107	\$9,643	\$31,750
Nepp Chemical						67.00	0.24%	0.25%	\$21,782	\$9,502	\$31,283
Globe Solvents						66.38	0.24%	0.00%	\$0	\$0	B
Continental Vanguard, Inc.						65.45	0.24%	0.25%			C
Zenith Products Corp.						63.00	0.23%	0.24%	\$20,481	\$8,934	\$29,415
Elco Corporation	61.00	2.67%	2.73%	\$252,738	\$111,282	61.00	0.22%	0.23%	\$19,831	\$8,651	\$392,481
Welox Inc.						61.00	0.22%	0.23%	\$19,831	\$8,651	\$28,482
North Industrial Chemicals						60.00	0.22%	0.22%			C
Graphic Packaging Corp.						59.57	0.22%	0.22%	\$18,386	\$8,448	\$27,814
Superior Metal Products						58.00	0.21%	0.22%	\$18,858	\$8,225	\$27,081
Mida Development						57.50	0.21%	0.22%	\$18,693	\$8,154	\$26,847
Solitario						57.00	0.21%	0.00%	\$0	\$0	B
Defense Reutilization & Marketing Grouping DRMO PHILADELPHIA						54.00	0.20%	0.20%			D, A
Simonetta Brothers						53.28	0.19%	0.00%	\$0	\$0	B
North Penn Polishing & Plating						52.55	0.19%	0.20%	\$17,084	\$7,452	\$24,536
Ark Products	5.00	0.22%	0.22%	\$20,716	\$9,120	52.00	0.19%	0.19%	\$16,905	\$7,374	\$54,115
East West Label Co. Inc.						49.50	0.18%	0.19%	\$16,092	\$7,020	\$23,112
Delco Wire & Cable, Inc./ Delco Elec.						47.00	0.17%	0.00%	\$0	\$0	B

* Superseding 4/27/88 VRS

A De maximis party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary.

E De minimis party.

AR000216

11/30/98

**Malvern TCE Superfund Site
Generator Volumetric Ranking Summary***
(By Descending Order)

Page 6 of 16

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Pitman Corp.						47.00	0.17%	0.16%	\$15,280	\$6,665	\$21,945
M Q S Inspection Inc./Magneflux						46.00	0.17%	0.17%	\$14,954	\$6,523	\$21,478
A & L Handles						43.00	0.16%	0.16%	\$13,979	\$6,098	\$20,077
J & J Spill						43.00	0.16%	0.16%			C, A
Lancaster Machinery Co.						43.00	0.16%	0.16%	\$13,979	\$6,098	\$20,077
Ametek, Inc.	9.00	0.39%	0.40%	\$37,289	\$16,416	42.18	0.15%	0.16%	\$13,713	\$5,962	\$73,399
Athens Controls						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
Blade Instrument Company						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
Cook Specialty Company						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
USG Grouping											
Devey Products						41.00	0.15%	0.15%			D, A
Adelphia Graphics Systems						40.05	0.15%	0.15%	\$13,020	\$5,680	\$18,700
C S S International Corp.	8.00	0.35%	0.36%	\$33,146	\$14,592	39.86	0.14%	0.15%	\$12,956	\$5,653	\$66,349
Chem Par						39.00	0.14%	0.15%	\$12,679	\$5,531	\$16,210
Formosa Plastics						39.00	0.14%	0.15%	\$12,679	\$5,531	\$16,210
Xynotech Inc.						39.00	0.14%	0.15%	\$12,679	\$5,531	\$16,210
Esion	36.00	1.58%	1.61%	\$140,157	\$65,663	38.00	0.14%	0.14%	\$12,354	\$5,389	\$232,562
Asplundh Manufac. Co.						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Brumbaugh Industries						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Cervel Hall Inc						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Menographics						36.84	0.13%	0.14%	\$11,977	\$5,224	\$17,201
Allister Mfg.						36.00	0.13%	0.13%	\$11,704	\$5,105	\$16,809
Decision Data						36.00	0.13%	0.13%	\$11,704	\$5,105	\$16,809
Petrocon	35.00	1.53%	1.57%	\$145,013	\$63,839	35.00	0.13%	0.13%	\$11,378	\$4,963	\$225,194

* Superseding 4/27/88 VRS

A De minimis party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If your party appears under a grouping, please refer to the combined entities throughout the Malvern TCE Superfund Site Volumetric Ranking Summary.

E De minimis party.

AR000217

ORIGINAL
(Red)

11/30/

Malvern TCE S Fund Site
Generator Volumetric Ranking Summary*
 (By Descending Order)

Page 7

ORIGINAL
RECEIVED

AR000218

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Phila. Electric Co. Oregon Maint. Shops						34.45	0.12%	0.13%	\$11,200	\$4,885	\$16,085
Accuracy Scientific	3.00	0.13%	0.13%	\$12,430	\$5,472	34.18	0.12%	0.13%	\$11,112	\$4,847	\$33,861
Electrolay						33.00	0.12%	0.12%	\$10,728	\$4,680	\$15,408
Specialty Castings Inc.						33.00	0.12%	0.12%	\$10,728	\$4,680	\$15,408
Control Switch	3.00	0.13%	0.00%	\$0	\$0	32.46	0.12%	0.00%	\$0	\$0	B
B. P. Oil						32.00	0.12%	0.12%	\$10,403	\$4,536	\$14,941
Pennsbury Manufacturing						32.00	0.12%	0.00%	\$0	\$0	B
Solid State Scientific						32.00	0.12%	0.12%	\$10,403	\$4,536	\$14,941
Trend Instruments						31.18	0.11%	0.12%	\$10,137	\$4,422	\$14,558
Heel Co.						31.00	0.11%	0.12%	\$10,078	\$4,386	\$14,474
Display Corporation of America						30.00	0.11%	0.11%	\$9,753	\$4,254	\$14,007
Telegenix Inc.						30.00	0.11%	0.11%	\$9,753	\$4,254	\$14,007
Johnson-Matthey						29.55	0.11%	0.11%	\$9,607	\$4,191	\$13,797
Laminators Inc.						29.00	0.11%	0.11%	\$9,428	\$4,113	\$13,540
Westcode Inc.						28.22	0.10%	0.11%	\$9,174	\$4,002	\$13,176
Anchor Darling Co.						28.00	0.10%	0.10%	\$9,103	\$3,971	\$13,074
G. K. Garrett Corp.						27.45	0.10%	0.10%	\$8,924	\$3,893	\$12,817
Cabot Grouping											
Cabot Wrought Products						27.00	0.10%	0.10%			D, A
Jetshapes Inc.						27.00	0.10%	0.10%	\$8,778	\$3,829	\$12,607
R. R. Donnelley & Sons, Inc.						27.00	0.10%	0.10%	\$8,778	\$3,829	\$12,607
Kawneer Corp.						26.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140
London Harness & Cable Co.						26.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140
Storm Weather Products						26.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140

* Superseding 4/27/96 VRS.

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary.

E De minimis party.

Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Accumetrics						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Model Finishing						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Sweda/Litton						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Frazer-Volpe Corporation						23.82	0.09%	0.09%	\$7,744	\$3,378	\$11,122
Amunee Mfg. Co.						23.00	0.08%	0.08%	\$7,477	\$3,282	\$10,739
Gas Springs						23.00	0.08%	0.09%	\$7,477	\$3,282	\$10,739
R D L Inc.						23.00	0.08%	0.09%	\$7,477	\$3,282	\$10,739
Westinghouse						23.00	0.08%	0.09%	\$7,477	\$3,282	\$10,739
Beemer Engineering	4.00	0.18%	0.18%	\$16,573	\$7,208	22.00	0.08%	0.08%	\$7,152	\$3,120	\$34,141
Bendru Company						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Candell Metals						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Data Media Inc.						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Philadelphia Rust Proof Co. Inc.						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
United Chem-Con Corp.						21.00	0.08%	0.00%	\$0	\$0	B
Matheson Instrument						20.10	0.07%	0.08%	\$6,534	\$2,850	\$9,385
Centol Inc.						20.09	0.07%	0.08%	\$6,531	\$2,849	\$9,380
Contamination Control, Inc.						20.00	0.07%	0.07%	\$6,502	\$2,838	\$9,338
Mitchell Specialty						20.00	0.07%	0.00%	\$0	\$0	B
Narco Avionics						19.00	0.07%	0.07%	\$6,177	\$2,694	\$8,871
U S Electronic Services Corp.	19.00	0.83%	0.00%	\$0	\$0	19.00	0.07%	0.00%	\$0	\$0	B
Deltron Incorporated						18.55	0.07%	0.07%	\$6,031	\$2,631	\$8,661
Kulicke & Soffa						18.54	0.07%	0.07%	\$6,027	\$2,629	\$8,657
Yuma-Edde Battery Corp.						18.13	0.07%	0.07%	\$5,894	\$2,571	\$8,465
David K. Robson, Inc.						18.00	0.07%	0.07%	\$5,852	\$2,553	\$8,404
Sidkens Co.						18.00	0.07%	0.07%	\$5,852	\$2,553	\$8,404
Airworks						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937

* Superceding 4/27/98 VRS

A De minimis party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If your party appears under a grouping, please refer to the combined entities throughout the Malvern TCE Superfund Site Volumetric Ranking Summary.

E De minimis party.

AR000219

ORIGINAL
(Red)

**Malvern TCE Site
Generator Volumetric Ranking Summary***
(By Descending Order)

ORIGINAL
(Red)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
C. K. Systematics, Inc.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Cobra Wire & Cable Co.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Oxford Metal Products						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Pennwell Corp.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Transducer Systems Inc.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Simpson Sign Co.						16.52	0.06%	0.00%	\$0	\$0	B
C W Industries						16.04	0.06%	0.06%	\$5,215	\$2,275	\$7,489
Mida Manufacturing	8.00	0.35%	0.00%	\$0	\$0	16.00	0.06%	0.00%	\$0	\$0	B
National Metal Crafters						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Olympic Tool & Machine Co.						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Plate Crafters Inc.						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Sharples, Inc.						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Diversified Electronic Corp.						15.53	0.06%	0.06%	\$5,049	\$2,202	\$7,251
Penn Airborn Product						15.31	0.06%	0.06%	\$4,977	\$2,171	\$7,148
Aero Plating						15.00	0.05%	0.00%	\$0	\$0	B
Concurrent Computer Corp.						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Gateway Terminal						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Penn Dye & Finishing						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Sonic Instruments						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Classic Coachworks						14.00	0.05%	0.05%	\$4,551	\$1,985	\$6,537
Hurst Part.						14.00	0.05%	0.05%	\$4,551	\$1,985	\$6,537
Repco	9.00	0.30%	0.00%	\$0	\$0	14.00	0.05%	0.00%	\$0	\$0	B
Technical Products						14.00	0.05%	0.05%	\$4,551	\$1,985	\$6,537
Boetel Industries						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Bunnell Plastics, Inc.						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070

* Superseding 4/27/86 VRS

A De minimis party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary.

E De minimis party.

AR000220

Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Cabot Grouping											
Cabot Company						13.00	0.05%	0.05%			D, A
Defense Reutilization & Marketing Grouping											
Madison, IN						13.00	0.05%	0.05%			D, A
EAM Corporation						13.00	0.05%	0.05%	\$4,228	\$1,844	\$6,070
Fabric Development						13.00	0.05%	0.05%	\$4,228	\$1,844	\$6,070
Imperial Specialty						13.00	0.05%	0.05%	\$4,228	\$1,844	\$6,070
Kosampel						13.00	0.05%	0.05%	\$4,228	\$1,844	\$6,070
Bo Peep Cleaners						12.63	0.05%	0.05%	\$4,106	\$1,791	\$5,897
Connecticut Mbed						12.00	0.04%	0.00%	\$0	\$0	B
Crown Marketing Equipment Co.						12.00	0.04%	0.04%	\$3,901	\$1,702	\$5,603
Formation Inc.						12.00	0.04%	0.04%	\$3,901	\$1,702	\$5,603
K S O Industries						12.00	0.04%	0.00%	\$0	\$0	B
Mack Wayne Plastics						12.00	0.04%	0.00%	\$0	\$0	B
Techalloy Inc.						11.67	0.04%	0.04%	\$3,794	\$1,655	\$5,449
Norco Finishing						11.00	0.04%	0.04%	\$3,576	\$1,560	\$5,136
Photolastic Inc.	11.00	0.46%	0.46%	\$45,576	\$20,084	11.00	0.04%	0.04%	\$3,576	\$1,560	\$70,775
U S A Ardec						11.00	0.04%	0.04%	\$3,576	\$1,560	\$5,136
Delta Flag Co.						10.22	0.04%	0.04%	\$3,322	\$1,448	\$4,772
Arnes Supply						10.00	0.04%	0.00%	\$0	\$0	B
Neutronics						10.00	0.04%	0.04%	\$3,251	\$1,418	\$4,669
Ponderosa Disposal Co.						10.00	0.04%	0.00%			C, B
Technitrol	10.00	0.44%	0.45%	\$41,432	\$18,240	10.00	0.04%	0.04%	\$3,251	\$1,418	\$64,341
A I W Frank						9.92	0.04%	0.00%	\$0	\$0	B
Agitar, Div. of Air Buensod, Inc.						9.00	0.03%	0.00%	\$0	\$0	B

* Superseding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If your party appears under a grouping, please refer to the combined entities throughout the Volumetric Ranking Summary.

E De minimis party.

AR000221

ORIGINAL
(Red)

11/30/

Malvern TCE S Fund Site
Generator Volumetric Ranking Summary*
 (By Descending Order)

Page 11 c

ORIGINAL
(Red)

AR000222

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
American Electronics Laboratories						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Delaware Container Co. Inc.						9.00	0.03%	0.00%	\$0	\$0	B
DeVries, Inc.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Hahn Truck Sales						9.00	0.03%	0.00%	\$0	\$0	B
Prodelin Inc.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Reynolds Metals						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Sprague-Griffiths Div.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Suntrop Industries	9.00	0.39%	0.00%	\$0	\$0	9.00	0.03%	0.00%	\$0	\$0	B
Victrolac Company of America						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Elisco						8.36	0.03%	0.03%	\$2,716	\$1,166	\$3,903
Defense Realization & Marketing Grouping											
Picatinny Arsenal						8.26	0.03%	0.03%			D, A
Dentronix, Inc.						8.04	0.03%	0.03%	\$2,614	\$1,140	\$3,754
A & J Screw Machine Products						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Berg Laboratories						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Driestbrook Engineering						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Fairfax Cleaners						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Meade Packaging						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Pentate V.D.A						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Photofabrication Chem & Equip						7.19	0.03%	0.03%	\$2,337	\$1,020	\$3,357
Herman Goldner Co. Inc.						7.09	0.03%	0.03%	\$2,305	\$1,005	\$3,310
Bigram Gear Company						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Fendi Finding Co., Inc.						7.00	0.03%	0.00%	\$0	\$0	B
Glitech Inc.						7.00	0.03%	0.00%	\$0	\$0	B

* Superseding 4/27/98 VRS

A De minimis party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary.

E De minimis party.

Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Hollingsworth						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Iron Bound Heat Treating Co.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Krautramer-Branson, Inc.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Mel Fin	7.00	0.31%	0.31%	\$29,003	\$12,768	7.00	0.03%	0.03%	\$2,276	\$993	\$45,039
Shur-Kut Supply Corp.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Silvina						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Valley Forge Laboratories, Inc.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Chrono-Log Corporation						6.28	0.02%	0.02%	\$2,042	\$991	\$2,932
ADEC						6.00	0.02%	0.00%	\$0	\$0	B
Alfa-Laval Separation, Inc.						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Angelo						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Coatings For Industry Inc.						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Fluid Power, Inc.						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Franklin Mint						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
K S M Fastening Systems Division						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Lovahn Corporation						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Philco Ford	6.00	0.26%	0.27%	\$24,859	\$10,944	6.00	0.02%	0.02%	\$1,951	\$851	\$38,605
Sarmetal						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Tele Dynamics						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Ferguson						5.96	0.02%	0.02%	\$1,936	\$845	\$2,783
Boyetown Packing Co.						5.27	0.02%	0.02%	\$1,713	\$747	\$2,461
Brandt Corporation						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Controls Service & Engineering						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Obon Industries Corp.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Enviro Crafts						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Green Tweed Co.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335

* Superceding 4/27/98 VRS

A De minimus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If your party appears under a grouping, please refer to the combined entities throughout the Malvern TCE Superfund Site Volumetric Ranking Summary.

E De minimis party.

AR000223

ORIGINAL
(Red)

Malvern TCE S Fund Site
Generator Volumetric Ranking Summary*
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Honeywell Instruments						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Pyco Inc.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Reynolds Cleaners						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Woodstream Corp.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Simco Company Inc.						4.52	0.02%	0.02%	\$1,469	\$641	\$2,110
E.I.T. Inc., Enterra Instrumentation Tech						4.51	0.02%	0.02%	\$1,466	\$640	\$2,106
Richard Hurst						4.08	0.01%	0.00%	\$0	\$0	B
Airline Hydraulic Corporation						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
AMF Head Division						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Artoo Corp.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Auto-Pack						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Chem Cell Corporation						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Doehler - Jarvis						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
E. Hopkins Co.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Est -Corporal						4.00	0.01%	0.00%	\$0	\$0	B
Far East Foods						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Hale Pumps, Inc.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Keystone Transformer						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
McHugh Railroad Maint Equip Co.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Monitor Systems	4.00	0.16%	0.16%	\$16,573	\$7,296	4.00	0.01%	0.01%	\$1,300	\$567	\$25,736
Phillips & Jacob	4.00	0.16%	0.16%			4.00	0.01%	0.01%			C
S G L						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Sullivan Labs						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Scott Paper Corp.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Solar Atmospheres						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Swede/Hugin Group						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868

* Superseding 4/27/86 VRS

A De minimis party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary.

E De minimis party.

AR000224

Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
United Contamination Controls Inc.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Gale Industries						3.55	0.01%	0.01%	\$1,154	\$503	\$1,658
Shared Medical Systems						3.27	0.01%	0.01%	\$1,083	\$464	\$1,527
Sterling Fishman Co.						3.11	0.01%	0.01%	\$1,011	\$441	\$1,452
A. Johnson & Co., Inc.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Brooks Instrument						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Danco Tool & Mold Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
E M R Photoelectric						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Emeco	3.00	0.13%	0.13%	\$12,430	\$5,472	3.00	0.01%	0.01%	\$975	\$425	\$19,302
Frontier Chemical Waste Process						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Glah Bros., Inc.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
H & L Cleaners						3.00	0.01%	0.00%	\$0	\$0	B
L & S Tool and Machine Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Lincoln						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Matthew International						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Ni-Chro						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Peripheral Dynamics						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Pennak/Sybron Corp.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Precision Arts Mfg.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Singer Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Troemner, Henry						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Wave Energy Systems						3.00	0.01%	0.00%	\$0	\$0	B
Wilkinson Industries						3.00	0.01%	0.00%	\$0	\$0	B
Industrial Systems Design						2.64	0.01%	0.00%	\$0	\$0	B
Lowry's						2.55	0.01%	0.00%	\$0	\$0	B
R C Kietzing						2.50	0.01%	0.01%	\$813	\$355	\$1,167

* Superseding 4/27/98 VRS

A De minimis party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If your party appears under a grouping, please refer to the combined entities throughout the Volumetric Ranking Summary.

E De minimis party.

AR000225

ORIGINAL
Red

Malvern TCE Site Fund Site
Generator Volumetric Ranking Summary*
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Petter Engraving Inc.						2.04	0.01%	0.01%	\$653	\$269	\$952
Boeing Property						2.00	0.01%	0.01%	\$650	\$264	\$934
Brittany's Ltd.						2.00	0.01%	0.00%	\$0	\$0	B
Chem-Solv						2.00	0.01%	0.01%	\$650	\$264	\$934
Delmeco Mfg. Inc.						2.00	0.01%	0.01%	\$650	\$264	\$934
Dynamic Services						2.00	0.01%	0.00%	\$0	\$0	B
Gulf & Western						2.00	0.01%	0.01%	\$650	\$264	\$934
Hufftronics						2.00	0.01%	0.01%	\$650	\$264	\$934
Johnson Company						2.00	0.01%	0.01%	\$650	\$264	\$934
P H L Inc.						2.00	0.01%	0.01%	\$650	\$264	\$934
Paris Business Forms						2.00	0.01%	0.01%	\$650	\$264	\$934
Pepco Manufacturing Co.						2.00	0.01%	0.01%	\$650	\$264	\$934
Peter Paul Cadbury Co.						2.00	0.01%	0.01%	\$650	\$264	\$934
Sperry Univac						2.00	0.01%	0.01%	\$650	\$264	\$934
Thermoseal Glass Corporation						2.00	0.01%	0.01%	\$650	\$264	\$934
Albright Paper & Box Corp.						1.11	0.00%	0.00%			E
Hough/Loew Associates						1.00	0.00%	0.00%			E
A. Duke Pyle						1.00	0.00%	0.00%			E
Ace Service Corp.						1.00	0.00%	0.00%			E
Antenna Corp.						1.00	0.00%	0.00%			E
Cincinnati Time						1.00	0.00%	0.00%			E
Devon Apparel						1.00	0.00%	0.00%			E
Durawood						1.00	0.00%	0.00%			E
Electro Tech Systems Inc.						1.00	0.00%	0.00%			E
Fatchid Space Systems						1.00	0.00%	0.00%			E
H I Services Inc.						1.00	0.00%	0.00%			E

* Superseding 4/27/88 VRS

A De minimis party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary.

E De minimis party.

Original
(Red)

AR000226

11/30/98

Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
 (By Descending Order)

Page 16 of 16

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Mars Money Systems						1.00	0.00%	0.00%			E
National Computer Systems						1.00	0.00%	0.00%			E
National Products						1.00	0.00%	0.00%			E
Parkin-Elmer						1.00	0.00%	0.00%			E
Pocono Foundry Inc.						1.00	0.00%	0.00%			E
Schmidt Brewery Co.						1.00	0.00%	0.00%			E
Schramm Inc.						1.00	0.00%	0.00%			E
Specialty Glass Products						1.00	0.00%	0.00%			E
Tube Methods						1.00	0.00%	0.00%			E
Tudor Tech Inc.						1.00	0.00%	0.00%			E
Welding Co.						1.00	0.00%	0.00%			E
T R W Inc.						0.45	0.00%	0.00%			E
Budd Co.						0.36	0.00%	0.00%			E
Jensen, Homer						0.36	0.00%	0.00%			E
Willtronics						0.30	0.00%	0.00%			E
Ughman Drum Co.						0.27	0.00%	0.00%			C
Meck Electric						0.27	0.00%	0.00%			E
Chester County Intermediate Unit						0.07	0.00%	0.00%			E
Thomson Engineering Co.	0.02	0.00%	0.00%			0.02	0.00%	0.00%			E
De Minimis Total:	673.00	26.00%	23.40%	\$2,168,627	\$660,287	8864.37	36.00%	33.51%	\$2,766,192	\$1,216,387	\$7,123,333
Total:	2281.71	100.00%	100.00%			27608.87	100.00%	100.00%			

* Superseding 4/27/96 VRS

A De minimis party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If your _____ appears under a grouping, please refer to the combined entities throughout the _____ Volumetric Ranking Summary.

E De minimis party.

AR000227

ORIGINAL
(Red)

**Malvern TCE Superfund Site
Explanation Sheet for the Final Volumetric Ranking Summary (VRS)**

The following provides an explanation of the information provided in the attached Malvern TCE Superfund Site (the Site) Final Volumetric Ranking Summary (VRS). Please refer to the example provided below for an illustration of the process used to calculate individual total payment.¹

PRP Name	FDA Drums	FDA %	FDA Revised %	FDA Cost	FDA Premium	MPA Drums	MPA %	MPA Revised %	MPA Cost	MPA Premium	Total Payment
ABC Corporation	34	1.49 %	1.52 %	\$141,249	\$62,182	82	0.29 %	0.30 %	\$26,325	\$11,483	\$241,239

PRP Name = The name of the specific potentially responsible party (PRP). Subsidiaries may be listed separately from parent companies; therefore, please review the VRS in its entirety to identify company subsidiaries that may have done business with Chemcene Corporation.

FDA Drums = The total number for drums sent to the Site before August 1, 1975.

FDA % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the total number of documented drums received by Chemcene Corporation prior to August 1, 1975, multiplied by 100.

FDA Revised % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the FDA total number of all non-orphan² drums received by Chemcene Corporation prior to August 1, 1975, multiplied by 100.

FDA Cost = The FDA Revised % divided by 100 and multiplied by \$9,263,078, the total past cost³ and estimated future cost associated with the FDA.

FDA Premium = The FDA Revised % divided by 100 and multiplied by the future estimated costs for the FDA (\$8,155,725) multiplied by the premium (50%).

MPA Drums = The total number of drums received at the Site, regardless of the date, for which the PRP is responsible.

MPA % = The total number of drums sent by the PRP, regardless of date, divided by the total number of documented drums received by Chemcene Corporation, multiplied by 100.

MPA Revised % = The total number of drums sent by the PRP, regardless of date, divided by the total number of non-orphan drums² received by Chemcene Corporation, regardless of date, multiplied by 100.

MPA Cost = MPA Revised % divided by 100 and multiplied by \$8,680,799, the total past cost³ and estimated future cost associated with the MPA.

MPA Premium = The MPA Revised % divided by 100 and multiplied by the future estimated costs for the MPA (\$7,573,426) multiplied by the premium (50%).

Total Payment = FDA Cost + FDA Premium + MPA Cost + MPA Premium.

¹ The FDA Cost, FDA Premium, MPA Cost, and MPA Premium figures are rounded to zero decimal places for display purposes only. The full number is used in the calculation of the Total Payment.

² Non-orphan drums are drums for which there is either a viable generator or a viable broker/transporter.

³ The total past cost for the Site as of June 17, 1997, is \$2,214,705.00. Half of this cost was allocated to the FDA, with the other half being allocated to the MPA.

AR000228

ORIGINAL
(Red)

11/30/98

**Malvern TCE Superfund Site
Generator Volumetric Ranking Summary***
(By Alphabetical Listing)

Page 1 of 15

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
A & J Screw Machine Products						8.00	0.03%	0.03%	\$2,801	\$1,135	\$3,735
A & L Handles						43.00	0.16%	0.16%	\$13,979	\$8,088	\$20,077
A I W Frank						9.92	0.04%	0.00%	\$0	\$0	B
A. Dule Pyle						1.00	0.00%	0.00%			D
A. Johnson & Co., Inc.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
A. S. Koch Corp.	137.00	6.00%	6.13%			250.00	0.91%	0.94%			A
Accumetrics						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,873
Accuracy Scientific	3.00	0.13%	0.13%	\$12,430	\$5,472	34.18	0.12%	0.13%	\$11,112	\$4,847	\$33,881
Ace Service Corp.						1.00	0.00%	0.00%			D
Acro Labels						88.00	0.31%	0.32%	\$27,958	\$12,198	\$40,154
Action Manufacturing Company	49.18	2.15%	2.20%			220.31	0.80%	0.83%			A
ADEC						6.00	0.02%	0.00%	\$0	\$0	B
Adelphia Graphics Systems						40.05	0.15%	0.15%	\$13,020	\$5,880	\$18,700
Aero Plating						15.00	0.05%	0.00%	\$0	\$0	B
Agitar, Div. of Air Buensod, Inc.						9.00	0.03%	0.00%	\$0	\$0	B
Airline Hydraulic Corporation						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Airworks						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Albright Paper & Box Corp.						1.11	0.00%	0.00%			D
ALCOA	40.00	1.75%	1.79%			275.00	1.00%	1.03%			A
Alfa-Laval Separation, Inc.						6.00	0.02%	0.02%	\$1,851	\$851	\$2,801
Allister Mfg.						38.00	0.13%	0.13%	\$11,704	\$5,105	\$16,809
Amchem						70.00	0.25%	0.26%	\$22,757	\$9,927	\$32,684
American Electronics Laboratories						9.00	0.03%	0.03%	\$2,828	\$1,278	\$4,202
Ames Supply						10.00	0.04%	0.00%	\$0	\$0	B
Ametek, Inc.	9.00	0.39%	0.40%	\$37,289	\$18,416	42.18	0.15%	0.16%	\$13,713	\$5,982	\$73,399
AMF Head Division						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Amp Corp.	34.00	1.49%	1.52%	\$140,870	\$62,015	133.00	0.48%	0.50%	\$43,238	\$18,861	\$264,984

* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C To [] ment for broker/transporter is detailed on the separate Broker/Transporter Volum [] nking Summary.

D De [] mis party.

ORIGINAL
11/30/98

AR000229

**Malvern TCE Perfund Site
Generator Volumetric Ranking Summary***
(By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Amunee Mfg. Co.						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
Anchor Darling Co.						28.00	0.10%	0.10%	\$9,103	\$3,971	\$13,074
Angelo						6.00	0.02%	0.02%	\$1,951	\$951	\$2,901
Antenna Corp.						1.00	0.00%	0.00%			D
Ark Products	5.00	0.22%	0.22%	\$20,716	\$9,120	52.00	0.19%	0.19%	\$16,805	\$7,374	\$54,115
Armstrong Cork Co.						522.70	1.89%	1.96%			A
Artco Corp.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Asplundh Manufac. Co.						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Aston-Hill Co.						74.00	0.27%	0.00%	\$0	\$0	B
Athena Controls						42.00	0.15%	0.16%	\$13,054	\$5,958	\$19,010
Auto-Pack						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Aydin						251.82	0.91%	0.94%			A
B. P. Oil						32.00	0.12%	0.12%	\$10,403	\$4,536	\$14,941
Beckett Corporation						250.55	0.91%	0.94%			A
Beemer Engineering	4.00	0.18%	0.18%	\$16,573	\$7,296	22.00	0.08%	0.08%	\$7,152	\$3,120	\$34,141
Bendru Company						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Beig Laboratories						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Biddle Instrument Company						42.00	0.15%	0.16%	\$13,054	\$5,958	\$19,010
Bilgram Gear Company						7.00	0.03%	0.03%	\$2,278	\$993	\$3,268
Bishop Tube Co.	60.00	2.63%	2.66%	\$248,594	\$109,438	130.00	0.47%	0.49%	\$42,283	\$18,436	\$418,731
Bo Peep Cleaners						12.63	0.05%	0.05%	\$4,106	\$1,791	\$5,897
Boeing Property						2.00	0.01%	0.01%	\$650	\$264	\$934
Boekel Industries						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Boyetown Packing Co.						5.27	0.02%	0.02%	\$1,713	\$747	\$2,461
Brandt Corporation						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Brittany's Ltd.						2.00	0.01%	0.00%	\$0	\$0	B
Brooks Instrument						3.00	0.01%	0.01%	\$975	\$425	\$1,401

* Superseding 4/27/98 VRS

A De minimis party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De minimis party.

AR000230

ORIGINAL
(Red)

Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Brumbaugh Industries						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Budd Co.						0.36	0.00%	0.00%			D
Bunnell Plastics, Inc.						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Burroughs Corp.	147.00	6.44%	6.56%			519.54	1.86%	1.85%			A
C S S International Corp.	6.00	0.35%	0.36%	\$33,146	\$14,592	39.86	0.14%	0.15%	\$12,958	\$5,653	\$66,340
C W Industries						16.04	0.06%	0.06%	\$5,215	\$2,275	\$7,489
C. K. Systematics, Inc.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Cabot Grouping						461.89	1.48%	1.50%			A
Cabot Beryco						143.00	0.52%	0.54%			A
Cabot Wrought Products						27.00	0.10%	0.10%			A
Cabot Company						13.00	0.05%	0.05%			A
Kaweck Beryco						218.00	0.79%	0.82%			A
Camdel Metals						21.00	0.08%	0.08%	\$6,827	\$2,976	\$9,805
Cantol Inc.						20.00	0.07%	0.08%	\$6,531	\$2,849	\$9,380
Carvel Hall Inc						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Chem Cell Corporation						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Chem Par						39.00	0.14%	0.15%	\$12,679	\$5,531	\$18,210
Chem-Solv						2.00	0.01%	0.01%	\$650	\$284	\$934
Chester County Intermediate Unit						0.07	0.00%	0.00%			D
Chobert Associates						85.15	0.31%	0.32%	\$27,862	\$12,075	\$39,757
Chrono-Log Corporation						6.28	0.02%	0.02%	\$2,042	\$894	\$2,932
Cincinnati Time						1.00	0.00%	0.00%			D
Classic Coachworks						14.00	0.05%	0.05%	\$4,551	\$1,985	\$6,537
Clifton Precision	34.00	1.49%	1.52%	\$140,870	\$62,015	82.00	0.30%	0.31%	\$26,056	\$11,629	\$241,172
Coatings For Industry Inc.						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Cobra Wire & Cable Co.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937

* Superceding 4/27/96 VRS

A De minimis party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C To [] ent for broker/transporter is detailed on the separate Broker/Transporter Volum [] nding Summary.

D De minimis party.

(Ref)
ORIGINAL

AR000231

**Malvern TCE Derfund Site
Generator Volumetric Ranking Summary***
(By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Concurrent Computer Corp.						15.00	0.05%	0.05%	\$4,876	\$2,127	\$7,004
Connecticut Mixed						12.00	0.04%	0.00%	\$0	\$0	B
Container Research Corporation						83.00	0.30%	0.31%	\$28,983	\$11,771	\$38,754
Contamination Control, Inc.						20.00	0.07%	0.07%	\$8,502	\$2,838	\$9,338
Continental Vanguard, Inc.						65.45	0.24%	0.25%	-	-	C
Control Switch	3.00	0.13%	0.00%	\$0	\$0	32.48	0.12%	0.00%	\$0	\$0	B
Controls Service & Engineering						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Cook Specialty Company						42.00	0.15%	0.16%	\$13,654	\$5,358	\$19,010
Crown Marketing Equipment Co.						12.00	0.04%	0.04%	\$3,901	\$1,702	\$5,603
Cyprus Foote Mineral Co.						495.00	1.78%	1.85%			A
Danco Tool & Mold Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Data Media Inc						21.00	0.06%	0.06%	\$8,827	\$2,978	\$9,805
David K. Robson, Inc.						18.00	0.07%	0.07%	\$5,852	\$2,553	\$8,404
Decision Data						36.00	0.13%	0.13%	\$11,704	\$5,105	\$16,809
Defense Reutilization & Marketing Grouping						349.58	1.27%	1.31%			A
Madison, IN						13.00	0.05%	0.05%			A
DRMS/PNSY						200.72	0.73%	0.75%			A
DRMO PHILADELPHIA						54.00	0.20%	0.20%			A
Picatinny Arsenal						8.28	0.03%	0.03%			A
DRMO Knox						74.00	0.27%	0.28%			A
Delaware Container Co. Inc.						9.00	0.03%	0.00%	\$0	\$0	B
Delbar Products						328.50	1.19%	1.23%			A
Delco Wire & Cable, Inc. / Delco Elec.						47.00	0.17%	0.00%	\$0	\$0	B
Delmeco Mfg. Inc.						2.00	0.01%	0.01%	\$850	\$284	\$934
Deltron Incorporated						18.55	0.07%	0.07%	\$8,031	\$2,631	\$8,661
Dertronix, Inc.						8.04	0.03%	0.03%	\$2,614	\$1,140	\$3,754

* Superceding 4/27/98 VRS

- A De maximus party and does not qualify for de minimis settlement offer.
- B Party has been identified as an orphan.
- C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.
- D De micromis party.

AR000232

ORIGINAL
(Red)

11/30/98

**Malvern TCE Superfund Site
Generator Volumetric Ranking Summary***
(By Alphabetical Listing)

Page 5 of 15

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Detra Flag Co.						10.22	0.04%	0.04%	\$3,322	\$1,449	\$4,772
DeVibiss, Inc.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Devon Apparel						1.00	0.00%	0.00%			D
Display Corporation of America						30.00	0.11%	0.11%	\$9,753	\$4,254	\$14,007
Diversified Electronic Corp.						15.53	0.06%	0.06%	\$5,049	\$2,202	\$7,251
Dixon Industries Corp.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Doehler - Jarvis						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Dorado Fabrics						119.00	0.43%	0.00%	\$0	\$0	B
Drexelbrook Engineering						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Durswood						1.00	0.00%	0.00%			D
Dynamic Services						2.00	0.01%	0.00%	\$0	\$0	B
E M R Photoelectric						3.00	0.01%	0.01%	\$975	\$425	\$1,401
E. Hopkins Co.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
E.I.T. Inc., Enterra Instrumentation Tech						4.51	0.02%	0.02%	\$1,466	\$640	\$2,106
E/M Corporation						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
East West Label Co. Inc.						49.50	0.18%	0.19%	\$16,082	\$7,020	\$23,112
Easton	36.00	1.58%	1.61%	\$149,157	\$65,663	36.00	0.14%	0.14%	\$12,354	\$5,389	\$232,562
Elco Corporation	61.00	2.67%	2.73%	\$252,738	\$111,282	61.00	0.22%	0.23%	\$19,831	\$8,651	\$392,481
Electro Platers of York Inc.						190.36	0.72%	0.75%	\$64,811	\$28,272	\$93,083
Electro Tech Systems Inc.						1.00	0.00%	0.00%			D
Electroloy						33.00	0.12%	0.12%	\$10,726	\$4,680	\$15,406
Electronic Display Systems/Hercules						224.00	0.61%	0.64%			A
Ellsco						8.36	0.03%	0.03%	\$2,718	\$1,186	\$3,903
Emeco	3.00	0.13%	0.13%	\$12,430	\$5,472	3.00	0.01%	0.01%	\$975	\$425	\$19,302
Empire Abrasive & Equipment Corp.						103.80	0.36%	0.39%	\$33,746	\$14,720	\$48,465
Ervin's Crafts						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Ext -Corporal						4.00	0.01%	0.00%	\$0	\$0	B

* Superceding 4/27/88 VRS

A De minimis party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C To be determined for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De minimis party.

AR000233

(Rev)
7/10/03

**Malvern TCE Derfund Site
Generator Volumetric Ranking Summary***
(By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
F B F Industries Inc.						130.00	0.47%	0.49%	\$42,263	\$16,436	\$60,699
Fabric Development						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Fairchild Space Systems						1.00	0.00%	0.00%			D
Fairfax Cleaners						6.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Far East Foods						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Fendt Finding Co., Inc.						7.00	0.03%	0.00%	\$0	\$0	B
Ferguson						5.96	0.02%	0.02%	\$1,938	\$845	\$2,783
Fischer & Porter Co/Andrews Glass	93.00	4.07%	4.16%			794.50	2.66%	2.98%			A
Fluid Power, Inc.						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Formation Inc.						12.00	0.04%	0.04%	\$3,901	\$1,702	\$5,603
Formosa Plastics						39.00	0.14%	0.15%	\$12,679	\$5,531	\$18,210
Franklin Mint						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Frazer-Volpe Corporation						23.62	0.09%	0.09%	\$7,744	\$3,378	\$11,122
Frontier Chemical Waste Process						3.00	0.01%	0.01%	\$975	\$425	\$1,401
G. K. Garrett Corp.						27.45	0.10%	0.10%	\$8,924	\$3,893	\$12,817
Gala Industries						3.55	0.01%	0.01%	\$1,154	\$503	\$1,658
Gas Springs						23.00	0.06%	0.06%	\$7,477	\$3,262	\$10,739
Gateway Terminal						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
General Electric						191.00	0.69%	0.72%	\$62,094	\$27,066	\$89,160
General Motors Corporation	5.00	0.22%	0.22%			517.00	1.87%	1.94%			A
Giles & Ransome						112.00	0.41%	0.42%	\$36,411	\$15,883	\$52,294
Giltech Inc.						7.00	0.03%	0.00%	\$0	\$0	B
Gish Bros., Inc.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Globe Solvents						66.36	0.24%	0.00%	\$0	\$0	B
Gould Inc.						68.00	0.25%	0.25%	\$22,107	\$9,643	\$31,750
Graphic Packaging Corp.						59.57	0.22%	0.22%	\$19,366	\$8,446	\$27,814
Green Tweed Co.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335

* Superseding 4/27/96 VRS

A De maximis party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De minimis party.

AR000234

ORIGINAL
(Red)

Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Gulf & Western						2.00	0.01%	0.01%	\$650	\$264	\$834
H & L Cleaners						3.00	0.01%	0.00%	\$0	\$0	B
H - V Industries, Inc.						151.50	0.55%	0.57%	\$49,252	\$21,485	\$70,737
H I Services Inc.						1.00	0.00%	0.00%			D
Hahn Truck Sales						9.00	0.03%	0.00%	\$0	\$0	B
Hale Pumps, Inc.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Hamilton Precision Metals						472.06	1.71%	1.77%			A
Hamilton Technology, Inc.						1234.00	4.47%	4.62%			A
Hamilton Watch Co.	197.00	8.63%	8.61%			904.00	3.27%	3.39%			A
Handy & Harman Tube Co. Inc						229.16	0.83%	0.88%			A
Heel Co.						31.00	0.11%	0.12%	\$10,078	\$4,366	\$14,474
Herrman Goldner Co. Inc.						7.00	0.03%	0.03%	\$2,305	\$1,005	\$3,310
High Energy Company						84.64	0.31%	0.32%	\$27,516	\$12,003	\$39,519
Hollingsworth						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Honeywell Instruments						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Hough/Loew Associates						1.00	0.00%	0.00%			D
Hulltronics						2.00	0.01%	0.01%	\$650	\$264	\$834
Hurst Perf.						14.00	0.05%	0.05%	\$4,551	\$1,985	\$6,537
Imperial Specialty						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Industrial Systems Design						2.64	0.01%	0.00%	\$0	\$0	B
Iron Bound Heat Treating Co.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
J W Rex Co.	21.00	0.92%	0.94%	\$87,008	\$38,303	88.00	0.31%	0.32%	\$27,958	\$12,196	\$165,466
J & J Spill						43.00	0.16%	0.16%			C
James Spring & Wire Co.	2.00	0.09%	0.09%	\$8,286	\$3,646	113.00	0.41%	0.42%	\$36,736	\$16,025	\$64,695
Jenson, Homer						0.36	0.00%	0.00%			D
Jetshapes Inc.						27.00	0.10%	0.10%	\$8,778	\$3,829	\$12,607
John Evan's & Sons, Inc.						203.29	0.74%	0.76%	\$66,089	\$28,829	\$94,918

* Superseding 4/27/96 VRS

A De minimis party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De minimis party.

(Page)
7/11/1998

AR000235

**Malvern TCE Superfund Site
Generator Volumetric Ranking Summary***
(By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Johnson Company						2.00	0.01%	0.01%	\$650	\$264	\$834
Johnson-Matthey						29.55	0.11%	0.11%	\$9,607	\$4,191	\$13,797
K - D Tool Manufacturing						95.00	0.34%	0.36%	\$30,684	\$13,472	\$44,357
K S M Fastening Systems Division						6.00	0.02%	0.02%	\$1,951	\$651	\$2,801
K S O Industries						12.00	0.04%	0.00%	\$0	\$0	B
Kawneer Corp.						26.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140
Keystone Transformer						4.00	0.01%	0.01%	\$1,300	\$567	\$1,668
Kjm Manufacturing						263.00	1.03%	1.06%			A
Kosempel						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Krautkramer-Branson, Inc.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Kulicke & Soffa						18.54	0.07%	0.07%	\$6,027	\$2,629	\$8,657
L & S Tool and Machine Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
LaFrance Corp.	12.00	0.53%	0.54%			416.00	1.60%	1.55%			A
Laminators Inc.						29.00	0.11%	0.11%	\$9,426	\$4,113	\$13,540
Lancaster Machinery Co.						43.00	0.16%	0.16%	\$13,979	\$6,096	\$20,077
Lavelle Aircraft Co.						189.55	0.69%	0.71%	\$61,622	\$26,661	\$88,503
Leeds & Northrop						145.72	0.53%	0.55%	\$47,373	\$20,665	\$68,038
Lightman Drum Co.						0.27	0.00%	0.00%			C
Lincoln						3.00	0.01%	0.01%	\$975	\$425	\$1,401
London Harness & Cable Co.						26.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140
Lovetkin Corporation						6.00	0.02%	0.02%	\$1,951	\$651	\$2,801
Lowry's						2.55	0.01%	0.00%	\$0	\$0	B
M Q S Inspection Inc./Magnaflux						46.00	0.17%	0.17%	\$14,954	\$6,523	\$21,478
Mack Electric						0.27	0.00%	0.00%			D
Mack Wayne Plastics						12.00	0.04%	0.00%	\$0	\$0	B
Malco						94.04	0.34%	0.35%	\$30,572	\$13,336	\$43,908
Manographics						36.84	0.13%	0.14%	\$11,977	\$5,224	\$17,201

* Superseding 4/27/98 VRS

A De maximis party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De minimis party.

AR000236

ORIGINAL
(Red)

Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Mars Electronics Inc.						110.99	0.40%	0.42%	\$36,083	\$15,740	\$51,822
Mars Money Systems						1.00	0.00%	0.00%			D
Materials Electronic Products						81.00	0.29%	0.30%	\$26,333	\$11,487	\$37,820
Matheson Instrument						20.10	0.07%	0.08%	\$8,534	\$2,850	\$9,385
Matthew International						3.00	0.01%	0.01%	\$875	\$425	\$1,401
McClarin Plastics						195.04	0.71%	0.73%	\$63,407	\$27,859	\$91,066
McGee Industries Inc.						97.00	0.35%	0.36%	\$31,534	\$13,756	\$45,290
McHugh Railroad Maint Equip Co.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Mesde Packaging						6.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Mel Fin	7.00	0.31%	0.31%	\$29,003	\$12,768	7.00	0.03%	0.03%	\$2,278	\$993	\$45,039
Mida Development						57.50	0.21%	0.22%	\$18,893	\$8,154	\$26,847
Mida Manufacturing	8.00	0.35%	0.00%	\$0	\$0	16.00	0.06%	0.00%	\$0	\$0	B
Mitchell Specialty						20.00	0.07%	0.00%	\$0	\$0	B
Model Finishing						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Monitor Systems	4.00	0.18%	0.18%	\$16,573	\$7,296	4.00	0.01%	0.01%	\$1,300	\$567	\$25,736
Moore Products	73.00	3.20%	3.27%	\$302,456	\$133,150	73.00	0.26%	0.27%	\$23,732	\$10,352	\$469,691
Morning Call						355.00	1.29%	1.33%			A
N G K Metals						145.00	0.53%	0.54%	\$47,139	\$20,563	\$67,702
NW Controls	4.00	0.18%	0.18%			374.59	1.38%	1.40%			A
Napp Chemical						67.00	0.24%	0.25%	\$21,782	\$9,502	\$31,283
Narco Avionics						19.00	0.07%	0.07%	\$8,177	\$2,694	\$8,871
National Computer Systems						1.00	0.00%	0.00%			D
National Metal Crafters						16.00	0.08%	0.08%	\$5,202	\$2,269	\$7,471
National Products						1.00	0.00%	0.00%			D
National Solvents Inc.						158.00	0.57%	0.00%	\$0	\$0	B
Netzsch Inc.						110.00	0.40%	0.41%	\$35,761	\$15,599	\$51,360
Neutronics						10.00	0.04%	0.04%	\$3,251	\$1,418	\$4,669

* Superseding 4/27/98 VRS

A De minimis party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total amount for broker/transporter is detailed on the separate Broker/Transporter Volume Ranking Summary.

D De minimis party.

ORIGINAL
(Red)

AR000237

Malvern TCE Derfund Site
Generator Volumetric Ranking Summary*
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
NI-Chro						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Norco Finishing						11.00	0.04%	0.04%	\$3,576	\$1,500	\$5,136
North Industrial Chemicals						60.00	0.22%	0.22%			C
North Penn Polishing & Plating						52.55	0.19%	0.20%	\$17,064	\$7,452	\$24,536
Olympic Tool & Machine Co.						16.00	0.06%	0.06%	\$5,292	\$2,269	\$7,471
Oxford Metal Products						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
P H L Inc.						2.00	0.01%	0.01%	\$650	\$284	\$934
P P & L Northern Div. S.C.						257.27	0.93%	0.96%			A
Paris Business Forms						2.00	0.01%	0.01%	\$650	\$284	\$934
Perflex Inc.	42.00	1.84%	1.86%	\$174,016	\$76,807	125.31	0.45%	0.47%	\$40,736	\$17,771	\$309,131
Penguin Industries						119.00	0.43%	0.45%	\$38,667	\$16,876	\$55,562
Penn Albion Product						15.31	0.06%	0.06%	\$4,977	\$2,171	\$7,148
Penn Dye & Finishing						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Pennsbury Manufacturing						32.00	0.12%	0.00%	\$0	\$0	B
Pennwall Corp.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Penske V.D.A						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Pepco Manufacturing Co.						2.00	0.01%	0.01%	\$650	\$284	\$934
Peripheral Dynamics						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Perkin-Elmer						1.00	0.00%	0.00%			D
Permutt/Sybron Corp.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Peter Paul Cadbury Co.						2.00	0.01%	0.01%	\$650	\$284	\$934
Petrocon	35.00	1.53%	1.57%	\$145,013	\$63,839	35.00	0.13%	0.13%	\$11,376	\$4,963	\$225,194
Petter Engraving Inc.						2.04	0.01%	0.01%	\$663	\$269	\$952
Phila. Electric Co. Oregon Maint. Shops						34.45	0.12%	0.13%	\$11,200	\$4,895	\$16,095
Philadelphia Rust Proof Co. Inc.						21.00	0.06%	0.06%	\$6,827	\$2,976	\$9,805
Philco Ford	6.00	0.26%	0.27%	\$24,859	\$10,944	6.00	0.02%	0.02%	\$1,951	\$851	\$36,605
Phillips & Jacob	4.00	0.16%	0.16%			4.00	0.01%	0.01%			C

* Superseding 4/27/96 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De minimis party.

AR000238

ORIGINAL
(Red)

Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Photofabrication Chem & Equip						7.19	0.03%	0.03%	\$2,337	\$1,020	\$3,357
Photoelastic Inc.	11.00	0.48%	0.40%	\$45,578	\$20,084	11.00	0.04%	0.04%	\$3,578	\$1,580	\$70,775
Pitman Corp.						47.00	0.17%	0.18%	\$15,280	\$6,685	\$21,965
Plate Crafters Inc.						16.00	0.08%	0.08%	\$5,202	\$2,269	\$7,471
Plymouth Tube	9.00	0.39%	0.40%			566.37	2.05%	2.12%			A
Pocono Foundry Inc.						1.00	0.00%	0.00%			D
Polysciences						184.00	0.67%	0.68%	\$59,818	\$26,094	\$85,912
Ponderosa Disposal Co.						10.00	0.04%	0.00%			C, B
Porter Instruments						226.27	0.83%	0.85%			A
Precision Arts Mfg.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Prince Instruments Inc.						79.00	0.29%	0.30%	\$25,683	\$11,203	\$36,886
Prodelin Inc.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Pyco Inc.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Quaker City Chemicals	7.00	0.31%	0.31%			268.09	0.97%	1.00%			C, A
R & E Martin, Inc.						118.29	0.42%	0.44%			C
R C A	32.00	1.40%	1.43%	\$132,584	\$58,367	177.00	0.64%	0.66%	\$57,542	\$25,101	\$273,504
R C Ketzling						2.50	0.01%	0.01%	\$813	\$355	\$1,167
R D L Inc.						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
R. R. Donnelley & Sons, Inc.						27.00	0.10%	0.10%	\$8,778	\$3,829	\$12,607
Relly Plating						430.00	1.56%	1.61%			A
Repco	9.00	0.39%	0.00%	\$0	\$0	14.00	0.05%	0.00%	\$0	\$0	B
Resource Technology Services, Inc.						473.72	1.72%	1.77%			C, A
Reynolds Cleaners						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Reynolds Metals						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Richard Hurl						4.08	0.01%	0.00%	\$0	\$0	B
S G L						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
S K F Industries Inc.						133.36	0.46%	0.50%	\$43,355	\$18,912	\$82,267

* Superceding 4/27/98 VRS

A De minimis party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total cost for broker/transporter is detailed on the separate Broker/Transporter Volume Ranking Summary.

D De minimis party.

AR000239

Malvern TCE Perfund Site
Generator Volumetric Ranking Summary*
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
S P D Technologies						87.00	0.32%	0.33%	\$20,264	\$12,338	\$40,621
S P S Technologies						167.00	0.60%	0.63%	\$54,291	\$23,683	\$77,974
Sandvik, Inc.						70.90	0.26%	0.27%	\$23,049	\$10,055	\$33,104
Sarivan Labs						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Schmidt Brewery Co.						1.00	0.00%	0.00%	.		D
Schramm Inc.						1.00	0.00%	0.00%			D
Scotco Design Group Inc.						69.00	0.25%	0.26%	\$22,432	\$9,765	\$32,217
Scott Paper Corp.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Sermetal						6.00	0.02%	0.02%	\$1,951	\$651	\$2,601
Shared Medical Systems						3.27	0.01%	0.01%	\$1,063	\$464	\$1,527
Sharples, Inc.						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Shur-Kut Supply Corp.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Sikens Co.						18.00	0.07%	0.07%	\$5,652	\$2,553	\$8,404
Silvine						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Simco Company Inc.						4.52	0.02%	0.02%	\$1,468	\$641	\$2,110
Simon Wrecking Company Inc.	715.51	31.33%	32.00%			983.51	3.56%	3.66%			A
Sironetta Brothers						53.26	0.19%	0.00%	\$0	\$0	B
Simpson Sign Co.						16.52	0.06%	0.00%	\$0	\$0	B
Singer Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Solar Atmospheres						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Solitario						57.00	0.21%	0.00%	\$0	\$0	B
Solid State Scientific						32.00	0.12%	0.12%	\$10,403	\$4,536	\$14,941
Sonic Instruments						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Specialty Castings Inc.						33.00	0.12%	0.12%	\$10,726	\$4,660	\$15,406
Specialty Glass Products						1.00	0.00%	0.00%			D
Sperry Univac						2.00	0.01%	0.01%	\$650	\$264	\$934
Spra-Fin Inc.						72.41	0.26%	0.27%	\$23,540	\$10,269	\$33,809

* Superceding 4/27/88 VRS

A De minimis party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De minimis party.

AR000240

ORIGINAL
(Red)

Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Sprague-Griffiths Div.						9.00	0.03%	0.03%	\$2,928	\$1,278	\$4,202
Stein Seal Co.						138.00	0.50%	0.52%	\$44,863	\$19,570	\$64,434
Sterling Fleishman Co.						3.11	0.01%	0.01%	\$1,011	\$441	\$1,452
Storm Weather Products						28.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140
Sunroc Corp.	52.00	2.28%	2.33%			358.00	1.30%	1.34%			A
Suntemp Industries	9.00	0.39%	0.00%	\$0	\$0	9.00	0.03%	0.00%	\$0	\$0	B
Superior Metal Products						58.00	0.21%	0.22%	\$18,858	\$8,225	\$27,081
Superior Tube	21.00	0.92%	0.94%	\$87,008	\$38,303	71.00	0.28%	0.27%	\$23,082	\$10,089	\$158,462
Sweda/Hugin Group						4.00	0.01%	0.01%	\$1,300	\$587	\$1,888
Sweda/Lifton						25.00	0.08%	0.09%	\$8,127	\$3,545	\$11,673
Syntex/Star Grouping						726.88	2.63%	2.72%			A
Syntex Dental Products						115.00	0.42%	0.43%			A
Star Dental Corporation						610.00	2.21%	2.28%			A
Synthane Taylor Corp.						71.00	0.28%	0.27%	\$23,082	\$10,089	\$33,151
T R W Inc.						0.46	0.00%	0.00%			D
Technaloy Inc.						11.87	0.04%	0.04%	\$3,794	\$1,855	\$5,449
Technical Products						14.00	0.05%	0.05%	\$4,551	\$1,885	\$6,537
Technitrol	10.00	0.44%	0.45%	\$41,432	\$18,240	10.00	0.04%	0.04%	\$3,251	\$1,418	\$64,341
Tele Dynamics						8.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Telegenix Inc.						30.00	0.11%	0.11%	\$9,753	\$4,254	\$14,007
Thermoseal Glass Corporation						2.00	0.01%	0.01%	\$650	\$284	\$834
Thomson Engineering Co.	0.02	0.00%	0.00%			0.02	0.00%	0.00%			D
Transducer Systems Inc.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Trend Instruments						31.18	0.11%	0.12%	\$10,137	\$4,422	\$14,558
Troemner, Henry						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Tube Methods						1.00	0.00%	0.00%			D

* Superceding 4/27/88 VRS

A De minimus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volume Ranking Summary.

D De minimis party.

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**Malvern TCE Fund Site
Generator Volumetric Ranking Summary***
(By Alphabetical Listing)

Page 14

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Tudor Tech Inc.						1.00	0.00%	0.00%			D
U S A Ardec						11.00	0.04%	0.04%	\$3,576	\$1,580	\$5,136
U S Electronic Services Corp.	19.00	0.83%	0.00%	\$0	\$0	19.00	0.07%	0.00%	\$0	\$0	B
United Chem-Con Corp.						21.00	0.09%	0.00%	\$0	\$0	B
United Contamination Controls Inc.						4.00	0.01%	0.01%	\$1,300	\$587	\$1,888
USG Grouping						896.49	2.12%	2.20%			A
U S G Interiors						182.00	0.66%	0.66%			A
Floor Systems Inc.						71.40	0.26%	0.27%			A
Donn Corporation						292.00	1.06%	1.09%			A
Davey Products						41.00	0.15%	0.15%			A
Valley Forge Laboratories, Inc.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Valley Forge Tape & Label Co.						122.36	0.44%	0.46%	\$39,779	\$17,352	\$57,131
Victualic Company of America						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Vishay Resistive Systems						241.00	0.87%	0.90%			A
Viz Manufacturing	104.00	4.55%	4.65%			819.84	2.97%	3.07%			A
Waste Conversion						104.00	0.39%	0.39%			C
Wave Energy Systems						3.00	0.01%	0.00%	\$0	\$0	B
Welding Co.						1.00	0.00%	0.00%			D
Wetex Inc.						61.00	0.22%	0.23%	\$19,831	\$8,651	\$28,482
Westcode Inc.						26.22	0.10%	0.11%	\$9,174	\$4,002	\$13,176
Western Electric	139.00	6.09%	6.22%			2063.00	7.54%	7.80%			A
Westinghouse						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
Wilkinson Industries						3.00	0.01%	0.00%	\$0	\$0	B
Wiltronics						0.30	0.00%	0.00%			D
Woodstream Corp.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Xynatech Inc.						39.00	0.14%	0.15%	\$12,679	\$5,531	\$18,210

* Superseding 4/27/96 VRS

A De minimis party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De minimis party.

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10/1/96
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Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Yussa-Exide Battery Corp.						18.13	0.07%	0.07%	\$5,894	\$2,571	\$8,465
Zenith Products Corp.						63.00	0.23%	0.24%	\$20,481	\$8,934	\$29,415
De Minimis Total:	673.80	25.80%	23.40%	\$2,168,627	\$450,287	984.37	36.80%	33.81%	\$2,786,132	\$1,218,287	\$7,123,333
Total:	2283.71	100.00%	100.00%			27808.87	100.00%	100.00%			

* Superseding 4/27/98 VRS

A De minimis party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C To ☐ ent for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De minimis party.

AR000242

Malvern TCE Superfund Site
Explanation Sheet for the Final Volumetric Ranking Summary (VRS)

The following provides an explanation of the information provided in the attached Malvern TCE Superfund Site (the Site) Final Volumetric Ranking Summary (VRS). Please refer to the example provided below for an illustration of the process used to calculate individual total payment.¹

PRP Name	FDA Drums	FDA %	FDA Revised %	FDA Cost	FDA Premium	MPA Drums	MPA %	MPA Revised %	MPA Cost	MPA Premium	Total Payment
ABC Corporation	34	1.49 %	1.52 %	\$141,249	\$62,182	82	0.29 %	0.30 %	\$26,325	\$11,483	\$241,239

PRP Name = The name of the specific potentially responsible party (PRP). Subsidiaries may be listed separately from parent companies; therefore, please review the VRS in its entirety to identify company subsidiaries that may have done business with Chemclene Corporation.

FDA Drums = The total number for drums sent to the Site before August 1, 1975.

FDA % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the total number of documented drums received by Chemclene Corporation prior to August 1, 1975, multiplied by 100.

FDA Revised % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the FDA total number of all non-orphan² drums received by Chemclene Corporation prior to August 1, 1975, multiplied by 100.

FDA Cost = The FDA Revised % divided by 100 and multiplied by \$9,263,078, the total past cost³ and estimated future cost associated with the FDA.

FDA Premium = The FDA Revised % divided by 100 and multiplied by the future estimated costs for the FDA (\$8,155,725) multiplied by the premium (50%).

MPA Drums = The total number of drums received at the Site, regardless of the date, for which the PRP is responsible.

MPA % = The total number of drums sent by the PRP, regardless of date, divided by the total number of documented drums received by Chemclene Corporation, multiplied by 100.

MPA Revised % = The total number of drums sent by the PRP, regardless of date, divided by the total number of non-orphan drums² received by Chemclene Corporation, regardless of date, multiplied by 100.

MPA Cost = MPA Revised % divided by 100 and multiplied by \$8,680,799, the total past cost³ and estimated future cost associated with the MPA.

MPA Premium = The MPA Revised % divided by 100 and multiplied by the future estimated costs for the MPA (\$7,573,426) multiplied by the premium (50%).

Total Payment = FDA Cost + FDA Premium + MPA Cost + MPA Premium.

¹ The FDA Cost, FDA Premium, MPA Cost, and MPA Premium figures are rounded to zero decimal places for display purposes only. The full number is used in the calculation of the Total Payment.

² Non-orphan drums are drums for which there is either a viable generator or a viable broker/transporter.

³ The total past cost for the Site as of June 17, 1997, is \$2,214,705.00. Half of this cost was allocated to the FDA, with the other half being allocated to the MPA.

ORIGINAL
(228)

AR000243

11/30/98

Malvern TCE Superfund Site Broker/Transporter Volumetric Ranking Summary*

Page 1 of 1

PRP Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Broker/ Transporter Total Payment	Generator Total De Minimis Payment	Total De Minimis Payment
Continental Vanguard, Inc.						89.38	0.32%	0.33%	\$29,082	\$12,877	\$41,739	\$30,571	\$72,310
Eldredge, Inc.						549.53	1.99%	2.06%					A
F T C Hazardous						89.91	0.33%	0.34%	\$29,240	\$12,755	\$41,998	\$0	\$41,998
Inland Pumping & Dredging Corp.						67.00	0.24%	0.00%					B
J & J Spill						115.54	0.42%	0.43%	\$37,578	\$16,391	\$53,967	\$20,085	\$74,052
Keystone-Block Transportation						723.27	2.82%	2.71%					A
Lightman Drum Co.						48.00	0.17%	0.18%	\$15,811	\$8,810	\$22,420	\$128	\$22,548
North Industrial Chemicals						24.00	0.09%	0.09%	\$7,805	\$3,405	\$11,210	\$28,025	\$39,235
P Q Corporation						67.00	0.24%	0.25%	\$21,790	\$9,505	\$31,295	\$0	\$31,295
Philadelphia Steel Drum Co. Inc.						43.00	0.16%	0.16%	\$13,984	\$6,100	\$20,085	\$0	\$20,085
Phillips & Jacob	20.00	0.88%	0.89%	\$82,865	\$36,479	20.00	0.07%	0.07%	\$6,504	\$2,837	\$128,688	\$25,804	\$154,490
Ponderosa Disposal Co.						111.00	0.40%	0.00%					B
Quaker City Chemicals	52.00	2.28%	2.33%			333.11	1.21%	1.25%					A
R & E Martin, Inc.						55.00	0.20%	0.21%	\$17,887	\$7,803	\$25,690	\$54,317	\$80,007
Resource Technology Services, Inc.						208.27	0.75%	0.77%					A
Waste Conversion						38.00	0.14%	0.14%	\$12,358	\$5,391	\$17,749	\$97,154	\$114,903
Waste Consulting & Brokerage						5.38	0.02%	0.02%	\$1,743	\$760	\$2,504	\$0	\$2,504
U.S. Environmental Services						4.00	0.01%	0.01%	\$1,301	\$587	\$1,888	\$0	\$1,888
Total:	72.00	3.16%	3.22%	\$82,865	\$36,479	2589.38	9.38%	9.82%	\$184,881	\$85,061	\$389,289	\$258,862	\$645,291

* Superseding 4/27/98 VRS.

A Party does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

AR000244

(copy)

ORIGINAL
(Red)

Malvern TCE Superfund Site
Explanation Sheet for the Third Round *De Minimis* Settlement - Volumetric Ranking Summaries

The following provides an explanation of the information provided in the attached Malvern TCE Superfund Site ("Site") Third Round *De Minimis* Settlement Volumetric Ranking Summary, dated 7/31/03 ("VRS").¹

PRP Name = The name of the specific potentially responsible party ("PRP").

FDA Drums = The total number of drums sent to the Site by each PRP before August 1, 1975.

FDA % = The total number of drums sent by the PRP to the Site prior to August 1, 1975, divided by the total number of documented drums received by Chemcene prior to August 1, 1975 (2,283.71 FDA drums), multiplied by 100.

FDA Revised % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the FDA total number of all non-orphan² FDA drums received by Chemcene Corporation prior to August 1, 1975 (2,200.69 FDA drums), multiplied by 100.

FDA Cost = The FDA Revised % divided by 100 and multiplied by the sum of \$11,139,818.90 (the total past costs³ and estimated future cost associated with the FDA).

FDA Premium = The FDA Revised % divided by 100 and multiplied by future estimated costs for the FDA (\$7,902,739.00)

¹ The FDA Cost, FDA Premium, MPA Cost, and MPA Premium figures are rounded to zero decimal places for display purposes only. Full numbers are used in the calculation of the DeMinimis Payment.

² Non-orphan drums reflect total drums into the Site, excluding drums attributed to orphans and non-settling de micromis parties. The total orphan and non-settling de micromis drums used for this settlement are 83.02 FDA drums and 1,622.82 MPA drums.

³ For purposes of this settlement, the total past costs for the Site is \$6,474,159.80 (\$5,302,459.63 in EPA Past Costs through June 26, 2002; \$359,739.17 in DOJ Past Costs through May 3, 2003; and \$811,961.00 in waterline costs incurred by the RD/RA Consent Decree PRPs). One-half of the Past Costs total, \$3,237,079.90, has been allocated to the FDA; the other half has been allocated to the MPA.

multiplied by the applicable premium (125% or 225%).

ORIGINAL
(Red)

MPA Drums = The total number of drums sent by each PRP to the Site, regardless of the date.

MPA % = The total number of drums sent by the PRP to the Site, regardless of date, divided by the total number of documented drums received by Chemclene Corporaton (27,608.87 drums), multiplied by 100.

MPA Revised % = The total number of drums sent by the PRP to the Site, regardless of date, divided by the total number of non-orphan² drums received by Chemclene Corporation (25,986.05 drums), multiplied by 100.

MPA Cost = MPA Revised % divided by 100 and multiplied by the sum of \$10,557,520.90, the total Past Cost³ and Estimated Future Costs associated with th MPA.

MPA Premium = The MPA Revised %, divided by 100 and multiplied by the future estimated costs for the MPA (\$7,320,441) multiplied by the applicable premium (125% or 225%).

Transporter Total Payment = The total payment (representing the sum of the FDA Cost, FDA Premium, MPA Cost, and MPA Premium) required for each *De Minimis* PRP identified in the VRS as a Transporter PRP.

Generator Total Payment = The total payment (representing the sum of the FDA Cost, FDA Premium, MPA Cost, and MPA Premium) required for each *De Minimis* PRP identified in the VRS as a Generator PRP.

Third Round De Minimis Settlement

Volumetric Ranking Summary

(Alphabetical by PRP)

ORIGINAL
7/14/03

PRP Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Broker/Transporter Total Payment	Generator Total Payment	Total Payment
Accuracy Scientific Instruments*	3.00	0.13	0.14	\$15,186	\$13,466	34.18	0.12	0.13	\$13,887	\$12,036			\$54,575
Airline Hydraulics Corporation						4.00	0.01	0.02	\$1,625	\$2,535			\$4,160
Allister Manufacturing						36.00	0.13	0.14	\$14,626	\$22,818			\$37,444
Ametek, Inc.	9.00	0.39	0.41	\$45,558	\$72,718	42.18	0.15	0.16	\$17,137	\$26,735			\$162,148
Amp	34.00	1.49	1.54	\$172,107	\$274,714	133.00	0.48	0.51	\$54,035	\$84,301			\$585,156
Ark Products	5.00	0.22	0.23	\$25,310	\$40,399	52.00	0.19	0.20	\$21,126	\$32,960			\$119,795
Athena Controls						42.00	0.15	0.16	\$17,064	\$26,621			\$43,685
Bishop Tube	60.00	2.63	2.73	\$303,718	\$484,789	130.00	0.47	0.50	\$52,816	\$82,399			\$923,722
CK Systematics, Inc.						17.00	0.06	0.07	\$6,907	\$10,775			\$17,682
Camdel Metals						21.00	0.08	0.08	\$8,532	\$13,311			\$21,842
Carvel Hall, Inc.						37.00	0.13	0.14	\$15,032	\$23,452			\$38,484
Chem Solv						2.00	0.01	0.01	\$813	\$1,268			\$2,080
Contamination Control						20.00	0.07	0.08	\$8,126	\$12,677			\$20,802
David K. Robson, Inc.						18.00	0.07	0.07	\$7,313	\$11,409			\$18,722
E. Hopkins Company						4.00	0.01	0.02	\$1,625	\$2,535			\$4,160
Emeco	3.00	0.13	0.14	\$15,186	\$24,239	3.00	0.01	0.01	\$1,219	\$1,902			\$42,546
Fabric Development						13.00	0.05	0.05	\$5,282	\$8,240			\$13,522
Fairfax Cleaners						8.00	0.03	0.03	\$3,250	\$5,071			\$8,321
Fergusson						5.96	0.02	0.02	\$2,421	\$3,778			\$6,199
Frazer-Volpe Corporation						23.82	0.09	0.09	\$9,678	\$15,098			\$24,776
FTC Hazardous (Broker)						89.91	0.33	0.35	\$36,528	\$56,989	\$93,517		\$93,517
G. K. Garrett Corporation						27.45	0.10	0.11	\$11,152	\$17,399			\$28,551
Glah Brothers, Inc.*						3.00	0.01	0.01	\$1,219	\$1,056			\$2,275
Gulf & Western						2.00	0.01	0.01	\$813	\$1,268			\$2,080
High Energy Company						84.64	0.31	0.33	\$34,387	\$53,648			\$88,035
Hulltronics						2.00	0.01	0.01	\$813	\$1,268			\$2,080
J & J Spill (Brokered Drums)**						115.54	0.42	0.44	\$46,941	\$73,234	\$120,175		\$120,175
J & J Spill (Generator Drums)**						43.00	0.16	0.17	\$17,470	\$27,255		\$44,725	\$44,725
Keystone Transformer*						4.00	0.01	0.02	\$1,625	\$1,409			\$3,034
Kosempel Manufacturing Co.*						13.00	0.05	0.05	\$5,282	\$4,578			\$9,859
Leeds & Northrop						145.72	0.53	0.56	\$59,203	\$92,363			\$151,566
Lightman Drum Co. (Brokered Drums)***						48.00	0.17	0.18	\$19,501	\$30,424	\$49,926		\$49,926
Lightman Drum Co. (Generator Drums)***						0.27	0.00	0.00	\$110	\$171		\$281	\$281
Malco Inc.						94.04	0.34	0.36	\$38,206	\$59,606			\$97,813

Third Round De Minimis Settlement

Volumetric Ranking Summary

(Alphabetical by PRP)

ORIGINAL
(Red)

PRP Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Broker/Transporter Total Payment	Generator Total Payment	Total Payment
Matheson Instrument						20.10	0.07	0.08	\$8,166	\$12,740			\$20,906
McClarin Plastics						195.04	0.71	0.75	\$79,240	\$123,624			\$202,864
Model Finishing						25.00	0.09	0.10	\$10,157	\$15,846			\$26,003
Narco Avionics						19.00	0.07	0.07	\$7,719	\$12,043			\$19,762
National Metalcrafters						16.00	0.06	0.06	\$6,500	\$10,141			\$16,642
Ni-Chro						3.00	0.01	0.01	\$1,219	\$1,902			\$3,120
Oxford Metal Products						17.00	0.06	0.07	\$6,907	\$10,775			\$17,682
Penn Airborne Products						15.31	0.06	0.06	\$6,220	\$9,704			\$15,924
Penske VDA*						8.00	0.03	0.03	\$3,250	\$2,817			\$6,067
Philadelphia Steel Drum (Brokered Drums)						43.00	0.16	0.17	\$17,470	\$27,255	\$44,725		\$44,725
Philco Ford*	6.00	0.26	0.27	\$30,372	\$26,933	6.00	0.02	0.02	\$2,438	\$2,113			\$61,855
Precision Arts Mfg.						3.00	0.01	0.01	\$1,219	\$1,902			\$3,120
Princo Instruments, Inc.						79.00	0.29	0.30	\$32,096	\$50,073			\$82,169
Prodelin, Inc.						9.00	0.03	0.03	\$3,656	\$5,705			\$9,361
R C Kletzing						2.50	0.01	0.01	\$1,016	\$1,585			\$2,600
Sermetal*						6.00	0.02	0.02	\$2,438	\$2,113			\$4,550
Shur-Kut Supply Corp						7.00	0.03	0.03	\$2,844	\$4,437			\$7,281
Solid State Scientific*						32.00	0.12	0.12	\$13,001	\$11,268			\$24,269
Storm Weather Products						26.00	0.09	0.10	\$10,563	\$16,480			\$27,043
Technitrol*						10.00	0.04	0.04	\$4,063	\$3,521			\$7,584
U.S. Environmental Services (Brokered Drums)*						4.00	0.01	0.02	\$1,625	\$1,409	\$3,034		\$3,034
Waste Consulting & Brokerage (Brokered Drums)*						5.36	0.02	0.02	\$2,178	\$1,887	\$4,065		\$4,065
Xynatech, Inc.						39.00	0.14	0.15	\$15,845	\$24,720			\$40,565
3rd Round De Minimis Total Number of Drums	120.00					1909.02							\$3,494,932
Site Total Number of Drums	2283.71					27608.87							

* Indicates 125% Premium is applied. All other parties receive 225% Premium.

**J & J Spill Total Payment = \$164,928

***Lightman Drum Total Payment = \$50,247

Enclosure D
Administrative Order of Consent III
Volumetric Ranking Summary

ORIGINAL
(Red)

Third Round De Minimis Settlement

Volumetric Ranking Summary

(by Descending Order)

ORIGINAL
(Red)

PRP Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Broker/Transporter Total Payment	Generator Total Payment	Total Payment
Frazer-Volpe Corporation						23.82	0.09	0.09	\$9,678	\$15,098			\$24,776
Model Finishing						25.00	0.09	0.10	\$10,157	\$15,846			\$26,003
Storm Weather Products						26.00	0.09	0.10	\$10,563	\$16,480			\$27,043
G. K. Garrett Corporation						27.45	0.10	0.11	\$11,152	\$17,399			\$28,551
Solid State Scientific*						32.00	0.12	0.12	\$13,001	\$11,268			\$24,269
Accuracy Scientific Instruments*	3.00	0.13	0.14	\$15,186	\$13,466	34.18	0.12	0.13	\$13,887	\$12,036			\$54,575
Allister Manufacturing						36.00	0.13	0.14	\$14,626	\$22,818			\$37,444
Carvel Hall, Inc.						37.00	0.13	0.14	\$15,032	\$23,452			\$38,484
Xynatech, Inc.						39.00	0.14	0.15	\$15,845	\$24,720			\$40,565
Athena Controls						42.00	0.15	0.16	\$17,064	\$26,621			\$43,685
Ametek, Inc.	9.00	0.39	0.41	\$45,558	\$72,718	42.18	0.15	0.16	\$17,137	\$26,735			\$162,148
J & J Spill (Generator Drums)**						43.00	0.16	0.17	\$17,470	\$27,255		\$44,725	\$44,725
Philadelphia Steel Drum (Brokered Drums)						43.00	0.16	0.17	\$17,470	\$27,255	\$44,725		\$44,725
Lightman Drum Co. (Brokered Drums)***						48.00	0.17	0.18	\$19,501	\$30,424	\$49,926		\$49,926
Ark Products	5.00	0.22	0.23	\$25,310	\$40,399	52.00	0.19	0.20	\$21,126	\$32,960			\$119,795
Princo Instruments, Inc.						79.00	0.29	0.30	\$32,096	\$50,073			\$82,169
High Energy Company						84.64	0.31	0.33	\$34,387	\$53,648			\$88,035
FTC Hazardous (Broker)						89.91	0.33	0.35	\$36,528	\$56,989	\$93,517		\$93,517
Malco Inc.						94.04	0.34	0.36	\$38,206	\$59,606			\$97,813
J & J Spill (Brokered Drums)**						115.54	0.42	0.44	\$46,941	\$73,234	\$120,175		\$120,175
Bishop Tube	60.00	2.63	2.73	\$303,718	\$484,789	130.00	0.47	0.50	\$52,816	\$82,399			\$923,722
Amp	34.00	1.49	1.54	\$172,107	\$274,714	133.00	0.48	0.51	\$54,035	\$84,301			\$585,156
Leeds & Northrop						145.72	0.53	0.56	\$59,203	\$92,363			\$151,566
McClarin Plastics						195.04	0.71	0.75	\$79,240	\$123,624			\$202,864
3rd Round De Minimis Total													
Number of Drums	120.00					1909.02							\$3,494,932
Site Total Number of Drums	2283.71					27608.87							

* Indicates 125% Premium is applied. All other parties receive 225% Premium.

**J & J Spill Total Payment = \$164,928

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Third Round De Minimis Settlement

Volumetric Ranking Summary

(by Descending Order)

PRP Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Broker/Transporter Total Payment	Generator Total Payment	Total Payment
Lightman Drum Co. (Generator Drums)***						0.27	0.00	0.00	\$110	\$171		\$281	\$281
Chem Solv						2.00	0.01	0.01	\$813	\$1,268			\$2,080
Gulf & Western						2.00	0.01	0.01	\$813	\$1,268			\$2,080
Hulltronics						2.00	0.01	0.01	\$813	\$1,268			\$2,080
R C Kletzing						2.50	0.01	0.01	\$1,016	\$1,585			\$2,600
Emeco	3.00	0.13	0.14	\$15,186	\$24,239	3.00	0.01	0.01	\$1,219	\$1,902			\$42,546
Glah Brothers, Inc.*						3.00	0.01	0.01	\$1,219	\$1,056			\$2,275
Ni-Chro						3.00	0.01	0.01	\$1,219	\$1,902			\$3,120
Precision Arts Mfg.						3.00	0.01	0.01	\$1,219	\$1,902			\$3,120
Airline Hydraulics Corporation						4.00	0.01	0.02	\$1,625	\$2,535			\$4,160
E. Hopkins Company						4.00	0.01	0.02	\$1,625	\$2,535			\$4,160
Keystone Transformer*						4.00	0.01	0.02	\$1,625	\$1,409			\$3,034
U.S. Environmental Services (Brokered Drums)*						4.00	0.01	0.02	\$1,625	\$1,409	\$3,034		\$3,034
Waste Consulting & Brokerage (Brokered Drums)*						5.36	0.02	0.02	\$2,178	\$1,887	\$4,065		\$4,065
Fergusson						5.96	0.02	0.02	\$2,421	\$3,778			\$6,199
Philco Ford*	6.00	0.26	0.27	\$30,372	\$26,933	6.00	0.02	0.02	\$2,438	\$2,113			\$61,855
Sermetal*						6.00	0.02	0.02	\$2,438	\$2,113			\$4,550
Shur-Kut Supply Corp						7.00	0.03	0.03	\$2,844	\$4,437			\$7,281
Fairfax Cleaners						8.00	0.03	0.03	\$3,250	\$5,071			\$8,321
Penske VDA*						8.00	0.03	0.03	\$3,250	\$2,817			\$6,067
Prodelin, Inc.						9.00	0.03	0.03	\$3,656	\$5,705			\$9,361
Technitrol*						10.00	0.04	0.04	\$4,063	\$3,521			\$7,584
Fabric Development						13.00	0.05	0.05	\$5,282	\$8,240			\$13,522
Kosempel Manufacturing Co.*						13.00	0.05	0.05	\$5,282	\$4,578			\$9,859
Penn Airborne Products						15.31	0.06	0.06	\$6,220	\$9,704			\$15,924
National Metalcrafters						16.00	0.06	0.06	\$6,500	\$10,141			\$16,642
CK Systematics, Inc.						17.00	0.06	0.07	\$6,907	\$10,775			\$17,682
Oxford Metal Products						17.00	0.06	0.07	\$6,907	\$10,775			\$17,682
David K. Robson, Inc.						18.00	0.07	0.07	\$7,313	\$11,409			\$18,722
Narco Avionics						19.00	0.07	0.07	\$7,719	\$12,043			\$19,762
Contamination Control						20.00	0.07	0.08	\$8,126	\$12,677			\$20,802
Matheson Instrument						20.10	0.07	0.08	\$8,166	\$12,740			\$20,906
Camel Metals						21.00	0.08	0.08	\$8,532	\$13,311			\$21,842

 ORIGINAL
(Red)

multiplied by the applicable premium (125% or 225%).

MPA Drums = The total number of drums sent by each PRP to the Site, regardless of the date.

MPA % = The total number of drums sent by the PRP to the Site, regardless of date, divided by the total number of documented drums received by Chemcene Corporaton (27,608.87 drums), multiplied by 100.

MPA Revised % = The total number of drums sent by the PRP to the Site, regardless of date, divided by the total number of non-orphan² drums received by Chemcene Corporation (25,986.05 drums), multiplied by 100.

MPA Cost = MPA Revised % divided by 100 and multiplied by the sum of \$10,557,520.90, the total Past Cost³ and Estimated Future Costs associated with th MPA.

MPA Premium = The MPA Revised %, divided by 100 and multiplied by the future estimated costs for the MPA (\$7,320,441) multiplied by the applicable premium (125% or 225%).

Transporter Total Payment = The total payment (representing the sum of the FDA Cost, FDA Premium, MPA Cost, and MPA Premium) required for each *De Minimis* PRP identified in the VRS as a Transporter PRP.

Generator Total Payment = The total payment (representing the sum of the FDA Cost, FDA Premium, MPA Cost, and MPA Premium) required for each *De Minimis* PRP identified in the VRS as a Generator PRP.

Malvern TCE Superfund Site
Explanation Sheet for the Third Round *De Minimis* Settlement - Volumetric Ranking Summaries

The following provides an explanation of the information provided in the attached Malvern TCE Superfund Site ("Site") Third Round *De Minimis* Settlement Volumetric Ranking Summary, dated 7/31/03 ("VRS").¹

PRP Name = The name of the specific potentially responsible party ("PRP").

FDA Drums = The total number of drums sent to the Site by each PRP before August 1, 1975.

FDA % = The total number of drums sent by the PRP to the Site prior to August 1, 1975, divided by the total number of documented drums received by Chemclene prior to August 1, 1975 (2,283.71 FDA drums), multiplied by 100.

FDA Revised % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the FDA total number of all non-orphan² FDA drums received by Chemclene Corporation prior to August 1, 1975 (2,200.69 FDA drums), multiplied by 100.

FDA Cost = The FDA Revised % divided by 100 and multiplied by the sum of \$11,139,818.90 (the total past costs³ and estimated future cost associated with the FDA).

FDA Premium = The FDA Revised % divided by 100 and multiplied by future estimated costs for the FDA (\$7,902,739.00)

¹ The FDA Cost, FDA Premium, MPA Cost, and MPA Premium figures are rounded to zero decimal places for display purposes only. Full numbers are used in the calculation of the DeMinimis Payment.

² Non-orphan drums reflect total drums into the Site, excluding drums attributed to orphans and non-settling de micromis parties. The total orphan and non-settling de micromis drums used for this settlement are 83.02 FDA drums and 1,622.82 MPA drums.

³ For purposes of this settlement, the total past costs for the Site is \$6,474,159.80 (\$5,302,459.63 in EPA Past Costs through June 26, 2002; \$359,739.17 in DOJ Past Costs through May 3, 2003; and \$811,961.00 in waterline costs incurred by the RD/RA Consent Decree PRPs). One-half of the Past Costs total, \$3,237,079.90, has been allocated to the FDA; the other half has been allocated to the MPA.

Malvern TCE Superfund Site
Explanation Sheet for the Third Round *De Minimis* Settlement - Volumetric Ranking Summaries

The following provides an explanation of the information provided in the attached Malvern TCE Superfund Site ("Site") Third Round *De Minimis* Settlement Volumetric Ranking Summary, dated 7/31/03 ("VRS").¹

PRP Name = The name of the specific potentially responsible party ("PRP").

FDA Drums = The total number of drums sent to the Site by each PRP before August 1, 1975.

FDA % = The total number of drums sent by the PRP to the Site prior to August 1, 1975, divided by the total number of documented drums received by Chemclene prior to August 1, 1975 (2,283.71 FDA drums), multiplied by 100.

FDA Revised % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the FDA total number of all non-orphan² FDA drums received by Chemclene Corporation prior to August 1, 1975 (2,200.69 FDA drums), multiplied by 100.

FDA Cost = The FDA Revised % divided by 100 and multiplied by the sum of \$11,139,818.90 (the total past costs³ and estimated future cost associated with the FDA).

FDA Premium = The FDA Revised % divided by 100 and multiplied by future estimated costs for the FDA (\$7,902,739.00)

¹ The FDA Cost, FDA Premium, MPA Cost, and MPA Premium figures are rounded to zero decimal places for display purposes only. Full numbers are used in the calculation of the DeMinimis Payment.

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ORIGINAL
(Red)

multiplied by the applicable premium (125% or 225%).

MPA Drums = The total number of drums sent by each PRP to the Site, regardless of the date.

MPA % = The total number of drums sent by the PRP to the Site, regardless of date, divided by the total number of documented drums received by Chemelene Corporation (27,608.87 drums), multiplied by 100.

MPA Revised % = The total number of drums sent by the PRP to the Site, regardless of date, divided by the total number of non-orphan² drums received by Chemelene Corporation (25,986.05 drums), multiplied by 100.

MPA Cost = MPA Revised % divided by 100 and multiplied by the sum of \$10,557,520.90, the total Past Cost³ and Estimated Future Costs associated with th MPA.

MPA Premium = The MPA Revised %, divided by 100 and multiplied by the future estimated costs for the MPA (\$7,320,441) multiplied by the applicable premium (125% or 225%).

Transporter Total Payment = The total payment (representing the sum of the FDA Cost, FDA Premium, MPA Cost, and MPA Premium) required for each *De Minimis* PRP identified in the VRS as a Transporter PRP.

Generator Total Payment = The total payment (representing the sum of the FDA Cost, FDA Premium, MPA Cost, and MPA Premium) required for each *De Minimis* PRP identified in the VRS as a Generator PRP.

Third Round De Minimis Settlement

Volumetric Ranking Summary

(Alphabetical by PRP)

PRP Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Broker/Transporter Total Payment	Generator Total Payment	Total Payment
Accuracy Scientific Instruments*	3.00	0.13	0.14	\$15,186	\$13,466	34.18	0.12	0.13	\$13,887	\$12,036			\$54,575
Airline Hydraulics Corporation						4.00	0.01	0.02	\$1,625	\$2,535			\$4,160
Allister Manufacturing						36.00	0.13	0.14	\$14,626	\$22,818			\$37,444
Ametek, Inc.	9.00	0.39	0.41	\$45,558	\$72,718	42.18	0.15	0.16	\$17,137	\$26,735			\$162,148
Amp	34.00	1.49	1.54	\$172,107	\$274,714	133.00	0.48	0.51	\$54,035	\$84,301			\$585,156
Ark Products	5.00	0.22	0.23	\$25,310	\$40,399	52.00	0.19	0.20	\$21,126	\$32,960			\$119,795
Athena Controls						42.00	0.15	0.16	\$17,064	\$26,621			\$43,685
Bishop Tube	60.00	2.63	2.73	\$303,718	\$484,789	130.00	0.47	0.50	\$52,816	\$82,399			\$923,722
CK Systematics, Inc.						17.00	0.06	0.07	\$6,907	\$10,775			\$17,682
Camdel Metals						21.00	0.08	0.08	\$8,532	\$13,311			\$21,842
Carvel Hall, Inc.						37.00	0.13	0.14	\$15,032	\$23,452			\$38,484
Chem Solv						2.00	0.01	0.01	\$813	\$1,268			\$2,080
Contamination Control						20.00	0.07	0.08	\$8,126	\$12,677			\$20,802
David K. Robson, Inc.						18.00	0.07	0.07	\$7,313	\$11,409			\$18,722
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Fabric Development						13.00	0.05	0.05	\$5,282	\$8,240			\$13,522
Fairfax Cleaners						8.00	0.03	0.03	\$3,250	\$5,071			\$8,321
Fergusson						5.96	0.02	0.02	\$2,421	\$3,778			\$6,199
Frazer-Volpe Corporation						23.82	0.09	0.09	\$9,678	\$15,098			\$24,776
FTC Hazardous (Broker)						89.91	0.33	0.35	\$36,528	\$56,989	\$93,517		\$93,517
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J & J Spill (Brokered Drums)**						115.54	0.42	0.44	\$46,941	\$73,234	\$120,175		\$120,175
J & J Spill (Generator Drums)**						43.00	0.16	0.17	\$17,470	\$27,255		\$44,725	\$44,725
Keystone Transformer*						4.00	0.01	0.02	\$1,625	\$1,409			\$3,034
Kosempel Manufacturing Co.*						13.00	0.05	0.05	\$5,282	\$4,578			\$9,859
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Lightman Drum Co. (Generator Drums)***						0.27	0.00	0.00	\$110	\$171		\$281	\$281
Malco Inc.						94.04	0.34	0.36	\$38,206	\$59,606			\$97,813

Malvern TCE Superfund Site

08/07/2003

Third Round De Minimis Settlement

Volumetric Ranking Summary

(Alphabetical by PRP)

ORIGINAL
(Red)

PRP Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Broker/ Transporter Total Payment	Generator Total Payment	Total Payment
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***Lightman Drum Total Payment = \$50,247

ORIGINAL
(Red)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III

IN THE MATTER OF:

Malvern TCE Superfund Site
258 N. Phoenixville Pike
Malvern, Pennsylvania

U.S. EPA Docket No.
CERC-03-2003-0041

Proceeding under Section 122(g)(4)
of the Comprehensive Environmental
Response, Compensation, and
Liability Act of 1980, as amended,
42 U.S.C. 9622(g)(4)

ADMINISTRATIVE ORDER ON CONSENT
FOR *DE MINIMIS* SETTLEMENT

TABLE OF CONTENTS

I. <u>JURISDICTION</u>	1
II. <u>STATEMENT OF PURPOSE</u>	2
III. <u>PARTIES BOUND</u>	2
IV. <u>DEFINITIONS</u>	3
V. <u>EPA'S STATEMENT OF FACTS</u>	6
VI. <u>DETERMINATIONS</u>	9
VII. <u>ORDER</u>	10
VIII. <u>PAYMENT</u>	11
IX. <u>FAILURE TO MAKE PAYMENT</u>	13
X. <u>CERTIFICATION OF RESPONDENTS</u>	13
XI. <u>COVENANT NOT TO SUE BY UNITED STATES</u>	14
XII. <u>RESERVATIONS OF RIGHTS BY UNITED STATES</u>	14
XIII. <u>COVENANT NOT TO SUE BY RESPONDENTS</u>	16
XIV. <u>EFFECT OF SETTLEMENT/CONTRIBUTION PROTECTION</u>	16
XV. <u>OPPORTUNITY FOR PUBLIC COMMENT</u>	17
XVI. <u>ATTORNEY GENERAL APPROVAL</u>	18
XVII. <u>COSTS AND FEES</u>	18
XVIII. <u>INTEGRATION/APPENDICES</u>	18
XIX. <u>EFFECTIVE DATE</u>	18

IN THE MATTER OF:

Malvern TCE Superfund Site
258 N. Phoenixville Pike
Malvern, Pennsylvania

U.S. EPA Docket No.
CERC-03-2003-0041

Proceeding under Section 122(g)(4)
of the Comprehensive Environmental
Response, Compensation, and
Liability Act of 1980, as amended,
42 U.S.C. § 9622(g)(4)

**ADMINISTRATIVE ORDER
ON CONSENT FOR *DE MINIMIS*
SETTLEMENT**

I. JURISDICTION

- A. This Administrative Order on Consent ("Consent Order" or "Order") is issued pursuant to the authority vested in the President of the United States by Section 122(g)(4) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. § 9622(g)(4), to reach settlements in actions under Section 106 or 107 of CERCLA, 42 U.S.C. § 9606 or 9607. The authority vested in the President has been delegated to the Administrator of the United States Environmental Protection Agency ("EPA") by Executive Order 12580, 52 Fed. Reg. 2923 (Jan. 29, 1987), and further delegated to the Regional Administrators of the EPA by EPA Delegation No. 14-14-E (September 13, 1987).
- B. This Consent Order represents a third Administrative Order On Consent for *De Minimis* Settlement entered into by and between EPA and *de minimis* potentially responsible parties ("PRPs") for the Malvern TCE Superfund Site.
- C. This Consent Order is entered into voluntarily by and between EPA and each of the *de minimis* potentially responsible parties listed in Appendix "A" who have executed the attached signature pages ("AOC III Respondents"). Each AOC III Respondent agrees to undertake all actions required by the terms and conditions of this Order. Each AOC III Respondent consents to and will not contest EPA's jurisdiction to issue this Order or to implement or enforce its terms.
- D. The AOC III Respondents agree and submit that the United States District Court for the Eastern District of Pennsylvania has jurisdiction over this Consent Order for the purposes of any subsequent proceedings for implementation or enforcement of this Order because a release or threatened release of hazardous substances has occurred at the Malvern TCE Superfund Site ("Site") in Malvern, Chester County, Pennsylvania, as hereinafter defined, which is located in such judicial district.

- E. This Consent Order was agreed to and executed by EPA and the AOC III Respondents in good faith to avoid the expense and delay of litigation over the matters addressed by this Consent Order.
- F. EPA and the AOC III Respondents agree that this Consent Order is entered into without any admission of liability for any purpose as to any matter arising out of the transactions or occurrences alleged in the Order. The participation of the AOC III Respondents in this Order shall not be considered an admission of liability and shall not be admissible in evidence against the AOC III Respondents in any judicial or administrative proceeding other than proceedings to implement or enforce this Order or a judgement relating to it.

II. STATEMENT OF PURPOSE

- 1. By entering into this Consent Order, the mutual objectives of the Parties are:
 - a. to reach a final settlement among the Parties with respect to the Site pursuant to Section 122(g) of CERCLA, 42 U.S.C. § 9622(g), that allows the AOC III Respondents to make a cash payment, including a premium, to resolve their alleged civil liability under Sections 106 and 107 of CERCLA, 42 U.S.C. §§ 9606 and 9607, for injunctive relief with regard to the Site and for response costs incurred and to be incurred at or in connection with the Site, thereby reducing litigation relating to the Site, subject to a reopener specified in Paragraph 31 below;
 - b. to simplify the remaining enforcement activities concerning the Site by reducing to the extent possible the number of parties involved in the Site;
 - c. to reimburse the Hazardous Substances Superfund for a portion of the response costs incurred or to be incurred in connection with the Site without waiving the United States' assertion of joint and several liability against parties other than the AOC III Respondents.

III. PARTIES BOUND

- 2. This Consent Order shall apply to and be binding upon EPA, and upon the AOC III Respondents, and their successors and assigns. Each signatory to this Consent Order represents that he or she is fully authorized to enter into the terms and conditions of this Consent Order and to execute and bind legally the Party represented by him or her. Any change in ownership or corporate status of any AOC III Respondent, including, but not limited to, any transfer of assets or real or

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personal property, shall in no way alter such AOC III Respondent's responsibilities under this Consent Order.

IV. DEFINITIONS

3. Unless otherwise expressly provided herein, terms used in this Consent Order that are defined in CERCLA or in regulations promulgated under CERCLA shall have the meaning assigned to them in the statute or regulations. Whenever the terms listed below are used in this Consent Order, the following definitions shall apply:
- a. "AOC I" or "*De Minimis* AOC I" shall mean the Administrative Order on Consent, Docket No. III-98-074-DC, by and between EPA and certain *De Minimis* PRPs ("AOC I Respondents") that became effective on or about September 28, 1999, in connection with the Site.
 - b. "AOC I VRS" shall mean volumetric ranking summaries, dated November 30, 1998, prepared by EPA in connection with the AOC I. The AOC I VRS set forth each *De Minimis* PRP's volumetric shares and settlement amounts to be paid in order to participate in the AOC I. AOC I VRS is attached as Appendix "C-1."
 - c. "AOC II" or "*De Minimis* AOC II" shall mean the Administrative Order on Consent, Docket No. III-CERCLA- 03-2001-0381, by and between EPA and certain *De Minimis* PRPs ("AOC II Respondents") that became effective on or about June 11, 2002, in connection with the Site.
 - d. "AOC II VRS" shall mean volumetric ranking summaries prepared by EPA in connection with the AOC II. The AOC II VRS set forth each AOC II Respondent's volumetric shares and settlement amounts to be paid in order to participate in the *De Minimis* AOC II. AOC II VRS is attached as Appendix "C-2."
 - e. "AOC III VRS" shall mean volumetric ranking summaries prepared by EPA in connection with the AOC III. The AOC III VRS set forth each AOC III Respondent's volumetric shares and settlement amounts to be paid in order to participate in the AOC III.
 - f. "CERCLA" shall mean the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended, 42 U.S.C. § 9601, et seq.

- g. "Consent Order," "Order," or "AOC III," shall mean this Administrative Order on Consent and all appendices attached hereto. In the event of conflict between this Order and any appendix, the Order shall control.
- h. "Day" shall mean a calendar day unless expressly stated to be a working day. "Working day" shall mean a day other than a Saturday, Sunday, or Federal holiday. In computing any period of time under this Consent Order, where the last day would fall on a Saturday, Sunday, or Federal holiday, the period shall run until the close of business of the next working day.
- i. "*De Minimis* PRPs" shall mean all potentially responsible parties identified by EPA for the Site eligible to participate in a *de minimis* settlement, as listed in the AOC I VRS, attached as Appendix "C-1," AOC II VRS, attached as Appendix "C-2," and/or AOC III VRS, attached as Appendix "D."
- j. "DOJ Past Response Costs" shall mean all Response Costs, including but not limited to, direct and indirect costs that DOJ has paid at or in connection with the Site through May 3, 2003, plus Interest on all such costs which has accrued pursuant to 42 U.S.C. § 9607(a) through such date.
- k. "DOJ Future Response Costs" shall mean all Response Costs, including but not limited to, direct and indirect costs that may be incurred by DOJ in connection with the Site after May 3, 2003, plus Interest on all such costs.
- l. "EPA" shall mean the United States Environmental Protection Agency and any successor departments, agencies or instrumentalities.
- m. "EPA Hazardous Substance Superfund" shall mean the Hazardous Substance Superfund established by the Internal Revenue Code, 26 U.S.C. § 9507.
- n. "EPA Past Response Costs" shall mean all Response Costs, including but not limited to, direct and indirect costs that EPA has paid at or in connection with the Site through June 25, 2002, as documented in the EPA Cost Report dated October 16, 2002, plus Interest on all such costs which has accrued pursuant to 42 U.S.C. § 9607(a) through such date.
- o. "EPA Future Response Costs" shall mean all Response Costs, including but not limited to, direct and indirect costs and recoverable costs of oversight of removal or remedial actions, that may be incurred by EPA in

connection with the Site after June 25, 2002, plus Interest on all such costs.

- p. "Hazardous Substance" shall have the meaning provided in Section 101(14) of CERCLA, 42 U.S.C. § 9601(14).
- q. "Interest" shall mean interest at the current rate specified for interest on investments of the EPA Hazardous Substance Superfund established by 26 U.S.C. § 9507, compounded annually on October 1 of each year, in accordance with 42 U.S.C. § 9607(a).
- r. "National Contingency Plan" or "NCP" shall mean the National Oil and Hazardous Substances Pollution Contingency Plan promulgated pursuant to Section 105 of CERCLA, 42 U.S.C. § 9605, as set forth at 55 Fed. Reg. 8,666 (March 8, 1990), and codified at 40 C.F.R. Part 300, including any amendments thereto.
- s. "Natural Resources" shall have the meaning provided in Section 101(16) of CERCLA, 42 U.S.C. § 9601(16).
- t. "Paragraph" shall mean a portion of this Consent Order identified by an arabic numeral or an upper case letter.
- u. "Parties" shall mean EPA and the AOC III Respondents.
- v. "Remedial Costs" shall mean all response costs incurred in implementing the remedial action called for in the Record of Decision ("ROD") dated November 26, 1997, and/or any Explanation for Significant Differences ("ESD") and/or any amendment to that ROD, and/or any new ROD issued in place of that ROD.
- w. "RD/RA Consent Decree" shall mean the Remedial Design/Remedial Action Consent Decree that was entered on December 13, 1999, in connection with the Site in United States v. Action Manufacturing Company, Inc., et. al., Civil Action No. 99-4402.
- x. "RD/RA Consent Decree PRPs" shall mean those Site PRPs that were signatories to the RD/RA Consent Decree.
- y. "Respondents III" or "AOC III Respondents" shall mean those persons, corporations, or other entities listed in Appendix "A," and successors and assigns of such persons, corporations, or other entities, that are signatories to this Consent Order.

- z. "Response Costs" shall mean all costs of "response" as that term is defined by Section 101(25) of CERCLA, 42 U.S.C. § 9601(25) incurred with respect to the Malvern TCE Superfund Site.
- aa. "Section" shall mean a portion of this Consent Order identified by a roman numeral.
- bb. "Site" shall mean the Malvern TCE Superfund Site, including areas defined in 40 C.F.R. § 300.400(e), located at and around 258 N. Phoenixville Pike in Malvern, Chester County, Pennsylvania and depicted more clearly on the map attached as Appendix "B."
- cc. "United States" shall mean the United States of America, including its departments, agencies and instrumentalities.

V. EPA'S STATEMENT OF FACTS

- 4. The Site is located at and around 258 N. Phoenixville Pike, Malvern, East Whiteland Township, Chester County, Pennsylvania. A Transcontinental Gas Pipeline Co. natural gas pipeline right-of-way extends along the southern boundary of the Site, with residential areas and areas with natural forestation and vegetation bordering the property to the west, north and east. The approximate area of the Site is identified on the map attached as Appendix "B."
- 5. The Site includes, but is not limited to, a parcel of approximately 5-acres at which Chemclene Corporation ("Chemclene"), from 1952 until 1992, among other things, sold and reclaimed industrial cleaning solvents including trichloroethene ("TCE"), 1,1,1,-trichloroethane, perchloroethylene, and methylene chloride. These solvents were used by local industries for degreasing metal parts and other cleaning purposes. Chemclene used a distillation process to remove impurities from the chlorinated solvents. The distilled solvents were then returned to customers for reuse. The end products of processing waste solvents are the reclaimed solvents and chlorinated still bottoms. The chlorinated waste solvents are listed hazardous wastes pursuant to the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6901 et seq., and, therefore, the resulting still bottoms are listed hazardous waste. Wastes shipped to Chemclene were stored, processed, disposed, and bulk accumulated at the Site for eventual transfer to other locations, and a small amount was directly transshipped to other locations.
- 6. Chemclene utilized two areas of the Site, the Main Plant Area ("MPA") and the Former Disposal Area ("FDA"), as part of its business operations. Chemclene utilized the MPA to receive, accumulate, store, and process wastes, including

hazardous substances. Wastes, including hazardous substances, also were released and disposed of at the MPA as a result of Chemclene's operations. Chemclene disposed of wastes, including hazardous substances, at the FDA.

7. In the spring of 1980, TCE was detected in groundwater from several wells in the vicinity of the Chemclene facility. Private domestic wells and on-Site monitoring wells were sampled by Pennsylvania's Department of Environmental Resources and Chemclene in June 1980 and July 1981. Analytical results of this sampling revealed contamination of the underlying aquifer with chlorinated ethenes and related compounds.
8. Pursuant to Section 105 of CERCLA, 42 U.S.C. § 9605, EPA proposed the Site for listing on the National Priorities List ("NPL"), set forth at 40 C.F.R. Part 300, Appendix "B," by publication in the Federal Register. Final listing on the NPL as the Malvern TCE Superfund Site was in September 1983.
9. Hazardous substances have been or are threatened to be released at or from the Site, including, but not limited to, at or from the MPA and FDA at the Site.
10. Between 1981 and 1986, Chemclene commenced certain activities, including installation of filters on contaminated home wells located within a residential development south of the Chemclene property, FDA debris and drum removal and limited soil excavation, and removal of underground storage tanks and soil sampling at the MPA, to address EPA concerns of contamination at the Site. In 1987, Chemclene entered into a Corrective Action Order pursuant to RCRA (Docket No. RCRA-III-010-CA) with EPA. Chemclene did not complete a RCRA Facilities Investigation of the Site or implement corrective measures at the Site, as required by the RCRA Order.
11. As a result of the release or threatened release of hazardous substances, EPA has undertaken response actions at or in connection with the Site under Section 104 of CERCLA, 42 U.S.C. § 9604, and will undertake response actions in the future. Among other things, EPA:
 - a. assumed control of maintenance activities of filter units that had been installed on contaminated residential wells located south of the Site and of periodic sampling of residential wells;
 - b. upgraded residential well filter systems in response to analytical results from well samples that showed contamination was passing through the existing filters into the homes;

- c. conducted and completed in January 1997 a Remedial Investigation of the Site;
 - d. completed a Feasibility Study of the Site in June 1997; and
 - e. issued a Record of Decision in November 1997 pursuant to which EPA selected a remedy to be implemented at the Site.
12. In performing these response actions, the EPA and DOJ have incurred and will continue to incur response costs. As of June 25, 2002, EPA had incurred \$5,302,459.63 in EPA Past Response Costs. As of May 3, 2003, DOJ had incurred \$359,739.17 in DOJ Past Response Costs. EPA and DOJ may incur, respectively, EPA Future Response Costs and DOJ Future Response Costs at the Site.
13. Commencing in 1996, EPA issued notice letters to approximately 250 Site PRPs, informing those PRPs of their potential liability pursuant to Section 107 of CERCLA, 42 U.S.C. Section 9607, in connection with the Site. Thereafter, EPA entered into the RD/RA Consent Decree with approximately 35 Site PRPs, pursuant to which the RD/RA Consent Decree PRPs agreed, among other things, to perform and fund the remedial action at the Site.
14. EPA also entered into two other Administrative Orders On Consent for *De Minimis* Settlement, AOC I and AOC II, with *De Minimis* PRPs in connection with the Site.
15. In December 2002, a number of RD/RA Consent Decree PRPs filed in the United States District Court for the Eastern District of Pennsylvania, Civil Action No. 02-8964, a contribution action against a number of Site PRPs, including *De Minimis* PRPs that have not entered into any *de minimis* settlements with EPA. EPA has received a number of requests from *de minimis* defendants, including many AOC III Respondents, seeking to settle their alleged CERCLA liability at the Site.
16. EPA has reviewed records describing the transactions of PRPs, including the *De Minimis* PRPs, in relation to the Site. These records include information describing the amount and nature of waste contributed to the Site. Based upon that review, EPA has determined that each *De Minimis* PRP, including each AOC III Respondent listed in Appendix "A," arranged for disposal or treatment, or arranged with a transporter for disposal or treatment, of a hazardous substance owned or possessed by such AOC III Respondent, at the Site, or accepted a hazardous substance for transport to the Site.

17. Information currently known to EPA indicates that each AOC III Respondent listed in Appendix "A," contributed between 1.6 drums and 0.75% of the total waste sent to the Site, and that the toxic or other hazardous effects of the hazardous substances contributed by each AOC III Respondent to the Site are not significantly more toxic than the other hazardous substances at the Site. The AOC III VRS lists, among other things, the estimated volume of waste contributed to the Site by each AOC III Respondent, and the percentage of waste contributed to the Site by each AOC III Respondent in relation to the total estimated volume of waste sent to the Site during the 1968 to 1992 time period. The volumes and percentage shares presented in the AOC III VRS represent EPA's best estimates and are based on all information currently in EPA's possession.
18. EPA has estimated that the total response costs incurred and to be incurred at or in connection with the Site by the EPA Hazardous Substance Superfund and by private parties is \$21,697,339.80. This amount includes \$5,302,459.63 in EPA Past Response costs, \$ 359,739.17 in DOJ Past Response costs, \$811,961.00 in response costs incurred by the RD/RA Consent Decree PRPs in completing installation of a public water supply, as required by the RD/RA Consent Decree, and Remedial Costs in the amount of \$15,223,180.00 (estimated future Site remedial costs in the amount of \$15,023,180.00, and EPA future remedial oversight costs estimated to be \$200,000.00). EPA has received certain information that indicates these estimated remedial costs could be revised.
19. The total payment required to be made by each AOC III Respondent pursuant to this Consent Order is set forth in the AOC III VRS, attached as Appendix "D." The total payment to be made by each AOC III Respondent represents a minor portion of this total response costs incurred and to be incurred at or in connection with the Site, as referenced in Paragraph 18 of this Consent Order.
20. EPA has identified PRPs other than AOC III Respondents, who owned or operated the Site, or who arranged for disposal or treatment, or arranged with a transporter for disposal or treatment, at the Site, of a hazardous substance owned or possessed by such persons.

VI. DETERMINATIONS

21. Based upon the Statement of Facts set forth above and on the administrative record for this Site, EPA has determined that:
 - a. the Site is a "facility" as that term is defined in Section 101(9) of CERCLA, 42 U.S.C. § 9601(9).

- b. each AOC III Respondent is a "person" as that term is defined in Section 101(21) of CERCLA, 42 U.S.C. § 9601(21).
- c. each AOC III Respondent is liable within the meaning of Sections 107(a) and 122(g)(1) of CERCLA, 42 U.S.C. §§ 9607(a) and 9622(g)(1).
- d. the materials shipped to the Site by the AOC III Respondents include "hazardous substances" within the meaning of Section 101(14) of CERCLA, 42 U.S.C. § 9601(14).
- e. the past, present or future migration of hazardous substances from the Site constitutes an actual or threatened "release" as that term is defined in Section 101(22) of CERCLA, 42 U.S.C. § 9601(22).
- f. the Past Response Costs incurred and Future Response Costs to be incurred in connection with the Site are removal and remedial response costs within the meaning of Section 107(a) of CERCLA, 42 U.S.C. § 9607(a).
- g. prompt settlement with each AOC III Respondent is practicable and in the public interest within the meaning of Section 122(g)(1) of CERCLA, 42 U.S.C. § 9622(g)(1).
- h. as to each AOC III Respondent, this Consent Order involves only a minor portion of the response costs at the Site within the meaning of Section 122(g)(1) of CERCLA, 42 U.S.C. § 9622(g)(1).
- i. each AOC III Respondent is eligible for a *de minimis* settlement pursuant to Section 122(g)(1)(A) of CERCLA, 42 U.S.C. § 9622(g)(1)(A), since both the amount and the toxicity or other hazardous effects of the hazardous substances contributed to the Site by each AOC III Respondent is minimal in comparison to other hazardous substances at the Site.

VII. ORDER

22. Based on the foregoing Statement of Facts and Determinations by EPA, in order to reach an expedited *de minimis* settlement in connection with the Site, in consideration of, and in exchange for, the promises, mutual undertakings, and covenants set forth herein, and intending to be legally bound hereby, EPA and the AOC III Respondents agree, and EPA hereby Orders, that the AOC III Respondents shall pay their cost share as set forth below:

- a. Within thirty (30) days of the effective date of this Order, each AOC III Respondent shall pay its volumetric share of the cost basis of \$21,697,339.80. This amount includes \$5,302,459.63 in EPA Past Response costs, \$ 359,739.17 in DOJ Past Response costs, \$811,961.00 in response costs incurred by the RD/RA Consent Decree PRPs in completing installation of a public water supply, as required by the RD/RA Consent Decree, and Remedial Costs in the amount of \$15,223,180.00 (estimated future Site remedial costs in the amount of \$15,023,180.00, and EPA future remedial oversight costs estimated to be \$200,000.00). The amount to be paid by each settling AOC III Respondent is set forth under the Total Payment Column included in the AOC III VRS, attached as Appendix "D."
- b. The *de minimis* settlement payment required of each AOC III Respondent, as referred to in Paragraph 25.a. of this Order, also includes a settlement premium. This premium is designed to cover risks and uncertainties associated with this settlement, including but not limited to, the risk that total response costs incurred or to be incurred at or in connection with the Site by the EPA Hazardous Substance Superfund, or by any private party incurring Remedial Costs, will exceed the estimated total response costs, upon which Respondent's payments are based. However, the premium is not designed to cover the risk that Site Remedial Costs will exceed \$31.2 million, and consequently, the Covenant Not to Sue is subject to the Reservation of Rights in 31.

VIII. PAYMENT

23. Payments by AOC III Respondents shall be made as follows:

- a. Within thirty (30) days of the effective date of this Consent Order, each AOC III Respondent shall pay the amount listed for the AOC III Respondent in the AOC III VRS, attached as Appendix "D" to this Consent Order and as specified in Section VII (Order), above.
- b. Payment may be made by certified or cashier's check made payable to "EPA Hazardous Substance Superfund." Each check shall reference the name and address of the party making payment, the Site name, the EPA Region and Site Spill ID Number 03-91, and the EPA Docket Number for this action, and shall be sent to:

EPA Superfund
U.S. EPA/Region III
Attention: Superfund Accounting

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P.O. Box 360515
Pittsburgh, PA 15251-6515

Overnight night deliveries shall be sent to:

Mellon Client Service Center
Room 670
500 Ross Street
Pittsburgh, PA 15262-0001
Attention: EPA, Region III, P.O. Box 360515

Payment also may be made by electronic wire transfer. Each transfer shall reference the name and address of the party making payment, the Site name, the EPA Region and Site Spill ID Number 03-91, and the EPA Docket Number for this action, and shall be sent to:

Mellon Bank
Pittsburgh, PA
ABA No. 043000261
credit EPA account number 9108552, lockbox 360515

Customer Service Phone Numbers are as follows:

412/234-4381 (lockbox)
412/234-6200 (wire transfer)

- c. At the time of payment, each AOC III Respondent shall send notice that such payment has been made to:

Charlie Root (3HS21)
Remedial Project Manager
United States Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

24. EPA shall deposit any *de minimis* settlement proceeds received into a Malvern TCE Superfund Site special account within the EPA Hazardous Substance Superfund. The proceeds can be retained and used by EPA; or by a party designated by EPA, to conduct or finance response actions at or in connection with the Site and/or, at EPA's discretion, can be transferred to the EPA Hazardous Substance Superfund as reimbursement for response costs incurred at or in connection with the Site by the EPA Hazardous Substance Superfund. Any amounts remaining in a Malvern TCE Superfund Site special account shall be transferred by EPA to the EPA Hazardous Substance Superfund.

25. Any amounts due and owing by an AOC III Respondent pursuant to the terms of this Consent Order but not paid in accordance with the terms of this Consent Order shall accrue Interest, as defined in Paragraph 3.n. of this Consent Order, which shall be assessed to such AOC III Respondent.

IX. FAILURE TO MAKE PAYMENT

26. If any AOC III Respondent fails to make a payment under the terms of this Consent Order within thirty (30) days of the payment becoming due, this Consent Order shall be terminated and the Covenant Not to Sue set forth in Section XI, Paragraph 30, shall become null and void as to that AOC III Respondent.
27. Nothing in this Consent Order shall be construed as prohibiting, altering, or in any way limiting the ability of the United States to seek any other remedies or sanctions available by virtue of a Respondent's violation of this Order or of the statutes and regulations upon which it is based, including, but not limited to, penalties pursuant to Section 122(l) of CERCLA, 42 U.S.C. § 9622(l).

X. CERTIFICATION OF RESPONDENTS

28. By signing this Consent Order, each AOC III Respondent certifies, individually, that, to the best of its knowledge and belief, it has:
- a. conducted a thorough, comprehensive, good faith search for documents, and that to the best of its knowledge and belief, such AOC III Respondent has no information which would result in a material change of the information set forth in the AOC I VRS, AOC II VRS, and/or the AOC III VRS. For purposes of this provision, a material change of the information set forth in the AOC I VRS, AOC II VRS, and/or AOC III VRS would occur if any PRP's Main Plant Area Percentage or Former Disposal Area Percentage listed in the AOC I VRS, AOC II VRS, and/or AOC III VRS changes by more than ten percent (10%). A material change of the information set forth in the AOC I VRS, the AOC II VRS, and/or AOC III VRS also would include any information that results in an increase in the MPA% for any PRP identified in the AOC I VRS, the AOC II VRS, and/or the AOC III VRS to greater than 0.75%;
 - b. not altered, mutilated, discarded, destroyed or otherwise disposed of any records, documents, or other information relating to its potential liability regarding the Site after notification of potential liability or the filing of a suit against it regarding the Site; and

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- c. fully complied with any and all EPA requests for information regarding the Site pursuant to Sections 104(e) and 122(e) of CERCLA, 42 U.S.C. §§ 9604(e) and 9622(e) and Section 3007 of RCRA, 42 U.S.C. § 6927.
29. If this certification is subsequently determined to be false, such AOC III Respondent shall forfeit all payments made pursuant to Section VIII of this Consent Order. Such forfeiture shall not constitute liquidated damages and shall not in any way foreclose the United States' right to pursue any other causes of action arising from such AOC III Respondent's false certification. Providing false, fictitious, or fraudulent statements or representations to the United States is punishable as a crime under 18 U.S.C. § 1001.

XI. COVENANT NOT TO SUE BY UNITED STATES

30. In consideration of the payments that will be made by the AOC III Respondents under the terms of this Consent Order, and except as specifically provided in Section XII (Reservations of Rights by United States), the United States covenants not to sue or take administrative action against any of the AOC III Respondents for civil liability for reimbursement of Response Costs or for injunctive relief pursuant to Sections 106 or 107 of CERCLA, 42 U.S.C. §§ 9606 or 9607, or for injunctive relief pursuant to Section 7003 of the RCRA, 42 U.S.C. § 6973, with regard to the Site. With respect to present and future liability, this covenant not to sue shall take effect for each AOC III Respondent upon receipt of that AOC III Respondent's payment as required by Section VIII. With respect to each AOC III Respondent, individually, these covenants are conditioned upon complete performance by such AOC III Respondent of all obligations under this Consent Order, and the veracity and completeness of the information provided to EPA by such AOC III Respondent relating to each AOC III Respondent's involvement with the Site. These covenants shall be null and void with respect to any individual AOC III Respondent that fails to perform all obligations under this Consent Order in a timely and complete manner, or has provided materially false, incomplete, or incorrect information in such AOC III Respondent's Certification under Section X of this Consent Order. These covenants extend only to AOC III Respondents and do not extend to any other person.

XII. RESERVATIONS OF RIGHTS BY UNITED STATES

31. The United States expressly reserves, and nothing in this Consent Order is intended to be nor shall it be construed as a release or covenant not to sue for, any claim or cause of action, administrative or judicial, civil or criminal, past or future, at law or in equity, which the United States, including EPA, may have against any of the AOC III Respondents for:

- a. any liability as a result of failure to make the payment required by Section VIII (Payment by AOC III Respondents), or otherwise comply with the terms of this Consent Order;
 - b. liability arising from the past, present, or future disposal, release or threat of release of hazardous substances at any facility, as defined in Section 101(9) of CERCLA, 42 U.S.C. § 9601(9), other than the Site;
 - c. any matters not expressly included in Section XI above (Covenant Not to Sue by the United States);
 - d. liability for damages for injury to, destruction of or loss of natural resources, and for the costs of any natural resource damage assessments;
 - e. liability for response costs relating to the Site that have been or may be incurred by Natural Resource trustees, including, but not limited to, the Department of Interior, of the United States;
 - f. criminal liability;
 - g. liability of any AOC III Respondent for violations of federal or state law; or
 - h. any liability for Remedial Costs in excess of \$31.2 million.
32. Nothing in this Consent Order constitutes a covenant not to sue or to take action or otherwise limits the ability of the United States to seek or obtain further relief from any AOC III Respondent, and the covenant not to sue set forth above and the contribution protection provided below will become null and void as to any individual AOC III Respondent, if:
- a. such AOC III Respondent contributed more than 0.75% of the total volume of the hazardous substances at the Site or contributed to the Site hazardous substances which contributed disproportionately to the cumulative toxic or other hazardous effects of the hazardous substances at the Site;
 - b. such AOC III Respondent fails to make a payment under the terms of this Consent Order; and/or,
 - c. such AOC III Respondent's certification in Section X of this Order is false or materially inaccurate.

XIII. COVENANT NOT TO SUE BY RESPONDENTS

33. AOC III Respondents covenant not to sue and agree not to assert any claims or causes of action against the United States or its contractors or employees with respect to the Site or this Consent Order including, but not limited to:
- a. Any direct or indirect claim for reimbursement from the EPA Hazardous Substance Superfund based on Sections 106(b)(2), 107, 111, 112, or 113 of CERCLA, 42 U.S.C. §§ 9606(b)(2), 9607, 9611, 9612, or 9613, or any other provision of law;
 - b. any claims arising out of response activities at the Site; and
 - c. any claim against the United States pursuant to Sections 107 and 113 of CERCLA, 42 U.S.C. §§ 9607 and 9613, relating to the Site.
34. Nothing in this Consent Order shall be deemed to constitute preauthorization or approval of a claim within the meaning of Section 111 of CERCLA, 42 U.S.C. § 9611, or 40 C.F.R. § 300.700(d).

XIV. EFFECT OF SETTLEMENT/CONTRIBUTION PROTECTION

35. Nothing in this Consent Order shall be construed to create any rights in, or grant any cause of action to, any person not a party to this Consent Order. The preceding sentence shall not be construed to waive or nullify any rights that any person not a signatory to this Consent Order may have under applicable law. The United States and the AOC III Respondents each reserve any and all rights (including, but not limited to, any right to contribution), defenses, claims, demands, and causes of action which each party may have with respect to any matter, transaction, or occurrence relating in any way to the Site against any person not a party hereto.
36. EPA and the AOC III Respondents agree that the actions undertaken by AOC III Respondents in accordance with this Consent Order do not constitute an admission of any liability by any AOC III Respondent. The AOC III Respondents do not admit, and retain the right to controvert in any subsequent proceedings, other than proceedings brought by the United States to implement or enforce this Consent Order, the validity of the Statement of Facts or Determinations contained in this Consent Order.
37. The AOC III Respondents agree that with respect to any suit or claim for contribution brought by them for matters related to this Consent Order they will provide notification to EPA in writing no later than sixty (60) days prior to the

initiation of such suit or claim. The AOC III Respondents also agree that with respect to any suit or claim for contribution brought against them for matters related to this Consent Order they will provide notification to EPA in writing within ten (10) days of service of the complaint on them. In addition, AOC III Respondents shall notify EPA within ten (10) days of receipt of any order from a court setting any such case for trial.

38. In any subsequent administrative or judicial proceeding initiated by the United States for injunctive relief, recovery of response costs, or other appropriate relief relating to the Site, AOC III Respondents shall not assert, and may not maintain, any defense or claim based upon the principles of waiver, res judicata, collateral estoppel, issue preclusion, claim-splitting, or other defenses based upon any contention that the claims raised by the United States in the subsequent proceeding were or should have been brought in the instant case; provided, however, that nothing in this Paragraph affects the enforceability of the covenants not to sue set forth in Section XI (Covenants Not to Sue by the United States).
39. Subject to the Reservation of Rights in Section XII of this Order, each AOC III Respondent, by entering into and complying with the terms of this Consent Order, is entitled to protection from contribution actions or claims as provided by Sections 113(f)(2) and 122(g)(5) of CERCLA, 42 U.S.C. §§ 9613(f)(2) and 9622(g)(5), for "matters addressed" in this Consent Order. The "matters addressed" in this Consent Order are all response actions taken by the United States and by private parties, and all response costs incurred and to be incurred by the United States and by private parties, at or in connection with the Site. The "matters addressed" in this settlement do not include those response costs or response actions as to which the United States has reserved its rights under this Consent Order (except for claims for failure to comply with this Consent Order), in the event that the United States asserts rights against AOC III Respondents coming within the scope of such reservations.

XV. OPPORTUNITY FOR PUBLIC COMMENT

40. This Consent Order shall be subject to a thirty-day public comment period pursuant to Section 122(i) of CERCLA, 42 U.S.C. § 9622(i), and Section 7003(d) of RCRA, 42 U.S.C. § 6973(d). EPA shall provide notice, and an opportunity for a public meeting in the affected area on the proposed settlement in accordance with Section 7003(d) of RCRA, 42 U.S.C. § 6973 (d). In accordance with Section 122(i)(3) of CERCLA, 42 U.S.C. § 9622(i)(3), EPA may withdraw or withhold its consent to this Consent Order if comments received disclose facts or considerations which indicate that this Consent Order is inappropriate, improper or inadequate.

XVI. ATTORNEY GENERAL APPROVAL

41. In accordance with Section 122(g)(4) of CERCLA, this Consent Order shall not become effective without the prior written approval of the Attorney General or his designee.

XVII. COSTS AND FEES

42. AOC III Respondents shall bear their own costs and attorney's fees regarding this matter. Nothing in this Consent Order shall be construed to create any rights in, or grant any cause of action to, any person not a Party to this Consent Order. The United States and AOC III Respondents each reserve any and all rights (including, but not limited to, any right to contribution), defenses, claims, demands, and causes of action which each Party may have with respect to any matter, transaction, or occurrence relating in any way to the Site against any person not a Party hereto.

XVIII. INTEGRATION/APPENDICES

43. This Consent Order and its appendices constitute the final, complete and exclusive agreement and understanding among the Parties with respect to the settlement embodied in this Consent Order. The Parties acknowledge that there are no representations, agreements or understandings relating to the settlement other than those expressly contained in this Consent Order. The following appendices are attached to and incorporated into this Consent Order:

"Appendix A" -- List of AOC III Respondents

"Appendix B" -- Map of the Site

"Appendix C-1" -- AOC I VRS

"Appendix C-2" -- AOC II VRS

"Appendix D" -- AOC III VRS

XIX. EFFECTIVE DATE

44. The effective date of this Consent Order shall be the date upon which EPA issues written notice to AOC III Respondents that the public comment period pursuant to Paragraph 40 has closed and that comments received, if any, do not require modification of or EPA withdrawal from this Consent Order.

In the Matter of Malvern TCE Superfund Site
Administrative Order on Consent for *De Minimis* Settlement,
U.S. EPA Docket No. CERC-03-2003-0041

IT IS SO AGREED AND ORDERED:

U.S. Environmental Protection Agency:

By: _____
Donald S. Welsh
Regional Administrator
Region III

Date

THE UNDERSIGNED RESPONDENT enters into this Administrative Order on Consent for *De Minimis* Settlement, U.S. EPA Docket No. CERC-03-2003-0041, relating to the Malvern TCE Superfund Site, 258 N. Phoenixville Pike, Malvern, Pennsylvania.

FOR RESPONDENT: _____
[Name]

[Address]

By: _____
[Signature] [Date]

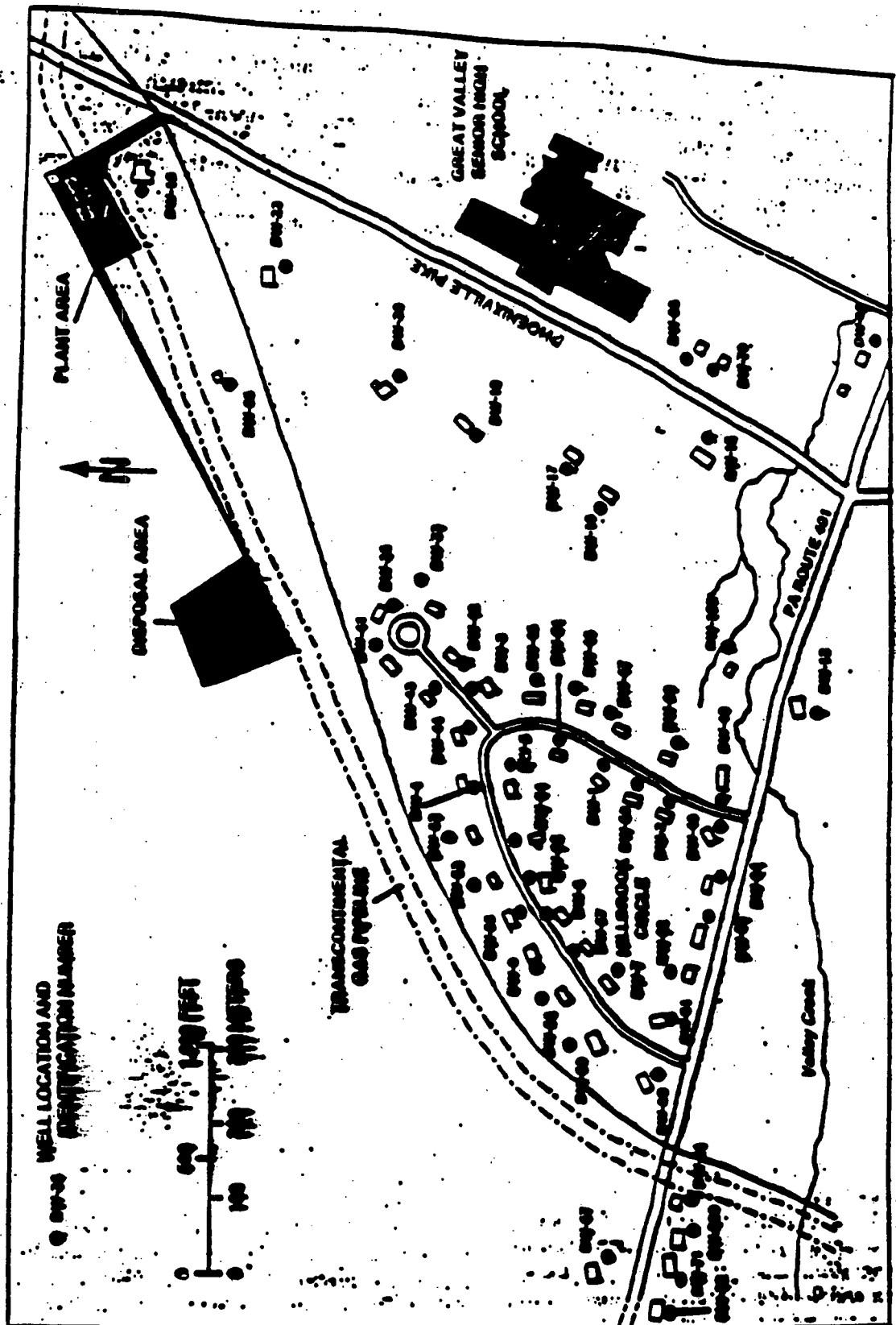
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Appendix A

List of AOC III PRPs/Settlors

Appendix B

Site Map



HALVERN TCE SITE MAP

Appendix C-1 AOC I VRS

Malvern TCE Superfund Site
Explanation Sheet for the Third Round *De Minimis* Settlement - Volumetric Ranking Summaries

The following provides an explanation of the information provided in the attached Malvern TCE Superfund Site ("Site") Third Round *De Minimis* Settlement Volumetric Ranking Summary, dated 7/31/03 ("VRS").¹

PRP Name = The name of the specific potentially responsible party ("PRP").

FDA Drums = The total number of drums sent to the Site by each PRP before August 1, 1975.

FDA % = The total number of drums sent by the PRP to the Site prior to August 1, 1975, divided by the total number of documented drums received by Chemclene prior to August 1, 1975 (2,283.71 FDA drums), multiplied by 100.

FDA Revised % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the FDA total number of all non-orphan² FDA drums received by Chemclene Corporation prior to August 1, 1975 (2,200.69 FDA drums), multiplied by 100.

FDA Cost = The FDA Revised % divided by 100 and multiplied by the sum of \$11,139,818.90 (the total past costs³ and estimated future cost associated with the FDA).

FDA Premium = The FDA Revised % divided by 100 and multiplied by future estimated costs for the FDA (\$7,902,739.00)

¹ The FDA Cost, FDA Premium, MPA Cost, and MPA Premium figures are rounded to zero decimal places for display purposes only. Full numbers are used in the calculation of the DeMinimis Payment.

² Non-orphan drums reflect total drums into the Site, excluding drums attributed to orphans and non-settling de micromis parties. The total orphan and non-settling de micromis drums used for this settlement are 83.02 FDA drums and 1,622.82 MPA drums.

³ For purposes of this settlement, the total past costs for the Site is \$6,474,159.80 (\$5,302,459.63 in EPA Past Costs through June 26, 2002; \$359,739.17 in DOJ Past Costs through May 3, 2003; and \$811,961.00 in waterline costs incurred by the RD/RA Consent Decree PRPs). One-half of the Past Costs total, \$3,237,079.90, has been allocated to the FDA; the other half has been allocated to the MPA.

ORIGINAL
(Red)

multiplied by the applicable premium (125% or 225%).

MPA Drums = The total number of drums sent by each PRP to the Site, regardless of the date.

MPA % = The total number of drums sent by the PRP to the Site, regardless of date, divided by the total number of documented drums received by Chemclene Corporation (27,608.87 drums), multiplied by 100.

MPA Revised % = The total number of drums sent by the PRP to the Site, regardless of date, divided by the total number of non-orphan² drums received by Chemclene Corporation (25,986.05 drums), multiplied by 100.

MPA Cost = MPA Revised % divided by 100 and multiplied by the sum of \$10,557,520.90, the total Past Cost³ and Estimated Future Costs associated with the MPA.

MPA Premium = The MPA Revised %, divided by 100 and multiplied by the future estimated costs for the MPA (\$7,320,441) multiplied by the applicable premium (125% or 225%).

Transporter Total Payment = The total payment (representing the sum of the FDA Cost, FDA Premium, MPA Cost, and MPA Premium) required for each *De Minimis* PRP identified in the VRS as a Transporter PRP.

Generator Total Payment = The total payment (representing the sum of the FDA Cost, FDA Premium, MPA Cost, and MPA Premium) required for each *De Minimis* PRP identified in the VRS as a Generator PRP.

Malvern TCE Superfund Site

Third Round De Minimis Settlement

Volumetric Ranking Summary

(by Descending Order)

08/07/2003

ORIGINAL
(Red)

PRP Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Broker/ Transporter Total Payment	Generator Total Payment	Total Payment
Lightman Drum Co. (Generator Drums)***						0.27	0.00	0.00	\$110	\$171		\$281	\$281
Chem Solv						2.00	0.01	0.01	\$813	\$1,268			\$2,080
Gulf & Western						2.00	0.01	0.01	\$813	\$1,268			\$2,080
Hulltronics						2.00	0.01	0.01	\$813	\$1,268			\$2,080
R C Kletzing						2.50	0.01	0.01	\$1,016	\$1,585			\$2,600
Emeco	3.00	0.13	0.14	\$15,186	\$24,239	3.00	0.01	0.01	\$1,219	\$1,902			\$42,546
Glah Brothers, Inc.*						3.00	0.01	0.01	\$1,219	\$1,056			\$2,275
Ni-Chro						3.00	0.01	0.01	\$1,219	\$1,902			\$3,120
Precision Arts Mfg.						3.00	0.01	0.01	\$1,219	\$1,902			\$3,120
Airline Hydraulics Corporation						4.00	0.01	0.02	\$1,625	\$2,535			\$4,160
E. Hopkins Company						4.00	0.01	0.02	\$1,625	\$2,535			\$4,160
Keystone Transformer*						4.00	0.01	0.02	\$1,625	\$1,409			\$3,034
U.S. Environmental Services (Brokered Drums)*						4.00	0.01	0.02	\$1,625	\$1,409	\$3,034		\$3,034
Waste Consulting & Brokerage (Brokered Drums)*						5.36	0.02	0.02	\$2,178	\$1,887	\$4,065		\$4,065
Fergusson						5.96	0.02	0.02	\$2,421	\$3,778			\$6,199
Philco Ford*	6.00	0.26	0.27	\$30,372	\$26,933	6.00	0.02	0.02	\$2,438	\$2,113			\$61,855
Sermetal*						6.00	0.02	0.02	\$2,438	\$2,113			\$4,550
Shur-Kut Supply Corp						7.00	0.03	0.03	\$2,844	\$4,437			\$7,281
Fairfax Cleaners						8.00	0.03	0.03	\$3,250	\$5,071			\$8,321
Penske VDA*						8.00	0.03	0.03	\$3,250	\$2,817			\$6,067
Prodelin, Inc.						9.00	0.03	0.03	\$3,656	\$5,705			\$9,361
Technitrol*						10.00	0.04	0.04	\$4,063	\$3,521			\$7,584
Fabric Development						13.00	0.05	0.05	\$5,282	\$8,240			\$13,522
Kosempel Manufacturing Co.*						13.00	0.05	0.05	\$5,282	\$4,578			\$9,859
Penn Airborne Products						15.31	0.06	0.06	\$6,220	\$9,704			\$15,924
National Metalcrafters						16.00	0.06	0.06	\$6,500	\$10,141			\$16,642
CK Systematics, Inc.						17.00	0.06	0.07	\$6,907	\$10,775			\$17,682
Oxford Metal Products						17.00	0.06	0.07	\$6,907	\$10,775			\$17,682
David K. Robson, Inc.						18.00	0.07	0.07	\$7,313	\$11,409			\$18,722
Narco Avionics						19.00	0.07	0.07	\$7,719	\$12,043			\$19,762
Contamination Control						20.00	0.07	0.08	\$8,126	\$12,677			\$20,802
Matheson Instrument						20.10	0.07	0.08	\$8,166	\$12,740			\$20,906
Camdel Metals						21.00	0.08	0.08	\$8,532	\$13,311			\$21,842

Third Round De Minimis Settlement

Volumetric Ranking Summary

(by Descending Order)

PRP Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Broker/Transporter Total Payment	Generator Total Payment	Total Payment
Frazer-Volpe Corporation						23.82	0.09	0.09	\$9,678	\$15,098			\$24,776
Model Finishing						25.00	0.09	0.10	\$10,157	\$15,846			\$26,003
Storm Weather Products						26.00	0.09	0.10	\$10,563	\$16,480			\$27,043
G. K. Garrett Corporation						27.45	0.10	0.11	\$11,152	\$17,399			\$28,551
Solid State Scientific*						32.00	0.12	0.12	\$13,001	\$11,268			\$24,269
Accuracy Scientific Instruments*	3.00	0.13	0.14	\$15,186	\$13,466	34.18	0.12	0.13	\$13,887	\$12,036			\$54,575
Allister Manufacturing						36.00	0.13	0.14	\$14,626	\$22,818			\$37,444
Carvel Hall, Inc.						37.00	0.13	0.14	\$15,032	\$23,452			\$38,484
Xynatech, Inc.						39.00	0.14	0.15	\$15,845	\$24,720			\$40,565
Athena Controls						42.00	0.15	0.16	\$17,064	\$26,621			\$43,685
Ametek, Inc.	9.00	0.39	0.41	\$45,558	\$72,718	42.18	0.15	0.16	\$17,137	\$26,735			\$162,148
J & J Spill (Generator Drums)**						43.00	0.16	0.17	\$17,470	\$27,255		\$44,725	\$44,725
Philadelphia Steel Drum (Brokered Drums)						43.00	0.16	0.17	\$17,470	\$27,255	\$44,725		\$44,725
Lightman Drum Co. (Brokered Drums)***						48.00	0.17	0.18	\$19,501	\$30,424	\$49,926		\$49,926
Ark Products	5.00	0.22	0.23	\$25,310	\$40,399	52.00	0.19	0.20	\$21,126	\$32,960			\$119,795
Princo Instruments, Inc.						79.00	0.29	0.30	\$32,096	\$50,073			\$82,169
High Energy Company						84.64	0.31	0.33	\$34,387	\$53,648			\$88,035
FTC Hazardous (Broker)						89.91	0.33	0.35	\$36,528	\$56,989	\$93,517		\$93,517
Malco Inc.						94.04	0.34	0.36	\$38,206	\$59,606			\$97,813
J & J Spill (Brokered Drums)**						115.54	0.42	0.44	\$46,941	\$73,234	\$120,175		\$120,175
Bishop Tube	60.00	2.63	2.73	\$303,718	\$484,789	130.00	0.47	0.50	\$52,816	\$82,399			\$923,722
Amp	34.00	1.49	1.54	\$172,107	\$274,714	133.00	0.48	0.51	\$54,035	\$84,301			\$585,156
Leeds & Northrop						145.72	0.53	0.56	\$59,203	\$92,363			\$151,566
McClarin Plastics						195.04	0.71	0.75	\$79,240	\$123,624			\$202,864
3rd Round De Minimis Total Number of Drums	120.00					1909.02							\$3,494,932
Site Total Number of Drums	2283.71					27608.87							

* Indicates 125% Premium is applied. All other parties receive 225% Premium.

**J & J Spill Total Payment = \$164,928

***Lightman Drum Total Payment = \$50,247

Enclosure E
Volumetric Ranking Summaries
Overview & Methodology

173973

Malvern TCE Volumetric Ranking Summaries/Overview and Methodology

This document provides a general overview and describes methodology utilized by EPA in the preparation of the Malvern TCE Superfund Site ("Site") Volumetric Ranking Summaries dated November 30, 1998 ("Summaries"). A description of *de minimis* settlement eligibility and requirements also is provided.

I. VOLUMETRIC RANKING SUMMARIES: OVERVIEW

The volumetric ranking summaries reflect revisions made by EPA to draft Site volumetric ranking summaries prepared by EPA and distributed to potentially responsible parties ("PRPs") for the Site on November 3, 1997 and April 30, 1998. Among other things, the attached Summaries incorporate information obtained by EPA as a result of: a) EPA's review and/or reconsideration of challenges submitted by PRPs to EPA to prior draft Site volumetric ranking summaries; b) review by EPA of Site records; and c) EPA research into the continued existence and viability of various PRPs identified in connection with the Site.

A. Generator and Transporter Volumetric Ranking Summaries

EPA has prepared two volumetric ranking summaries for the Site: a Generator Volumetric Ranking Summary ("Generator VRS") and a Broker/Transporter Volumetric Ranking Summary ("Broker/Transporter VRS"). As a result of EPA's review of Site records documenting transactions between PRPs and Chemclene, a number of brokers/transporters have been identified. The Summaries are intended to reflect all generator and broker/transporter PRP transactions at the Site and to attribute to each generator and broker/transporter identified at the Site, the full volume of waste into the Site contributed by each, as reflected in Site records. All documented shipments of waste to the Site are reflected in the Generator VRS; transactions involving brokers/transporters also are reflected in the Broker/Transporter VRS. See Section II.D. of this Overview and Methodology for additional details relating to generator and broker/transporter transactions.

B. Information contained in Summaries

In general, the attached Summaries provide the following for each PRP:

1. The volume of waste each PRP contributed to the Site.

This volume reflects, for each PRP, the total volume of waste, as measured in 55-gallon drum units, each PRP contributed to the Former Disposal Area ("FDA") and the Main Plant Area ("MPA") of the Site, areas used by Chemclene as part of its operations. These amount are reflected in the "FDA Drums" and the "MPA Drums" columns of the Summaries. See Section II.B.3. of this Overview and Methodology for details regarding EPA's methodology

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relating to the FDA and MPA.

2. The percentage of waste each PRP contributed to the FDA and MPA.

This percentage reflects each PRP's percentage of waste contributed to the FDA and MPA, relative to the percentage of total waste sent by all PRPs to the FDA and MPA, respectively. These percentages are reflected in the "FDA %" and "MPA %" columns of the Summaries.

3. The revised percentage of waste each PRP contributed to the FDA and MPA.

EPA has determined that some Site PRPs are no longer financially viable corporate entities, and, therefore, are Site "orphans" that will not participate in any *de minimis* settlement with EPA. These orphan shares have been apportioned on a *pro rata* basis among non-orphan Site PRPs. This apportionment is reflected in the "Revised FDA %" and "Revised MPA %" columns of the Summaries.

4. *De minimis* settlement payment required of each settling *de minimis* PRP.

The Summaries include each eligible *de minimis* PRP's share of costs such PRP will be required to pay in order to participate in a *de minimis* settlement with EPA. The total payment required of each *de minimis* PRP is reflected in the "Total Payment" column of the Summaries. The total payment required of each PRP includes each PRP's share of costs associated with the FDA and MPA, as set forth in the "FDA Cost" and "MPA Cost" columns of the Summaries. In addition, the total payment required of each PRP includes a premium payment assessed by EPA to take into account remedy and cost risks assumed by EPA in connection with the Site and the *de minimis* settlement. The premium is not assessed on EPA's past costs, but only on the estimated future costs. Premiums are reflected in the "FDA Premium" and "MPA Premium" columns of the Summaries.

See the Explanation Sheets attached to the Summaries for additional details regarding the information contained in the Summaries.

II. METHODOLOGY UTILIZED BY EPA WHEN CREATING THE VOLUMETRIC RANKING SUMMARIES

A. Documents Used

The Summaries prepared for the Site were compiled using Site documents obtained by EPA from Chemclene. These documents, which include invoices, receipts, purchase orders, manifests, and a number of other related documents, refer to transactions dating from 1968 until 1992 between Chemclene and its customers. These documents memorialize a number of

different types of transactions, reflecting the varied nature of Chemclene's business and Chemclene's changing billing practices. Examples of the transactions reflected in the documents include, but are not limited to:

1. Shipment of solvent and non-solvent waste from waste generators to Chemclene for processing and/or disposal;
2. Transshipments of solvent and non-solvent waste from Chemclene to other treatment, storage and disposal facilities;
3. Transfer of reclaimed solvents from Chemclene back to the original waste generator;
4. Transfer of raw or reclaimed solvent from Chemclene to customers;
5. Return of unused solvents or unused empty drums from customers to Chemclene;
6. Transfer of empty drums from Chemclene to waste generators to be filled up with wastes;
7. Purchases of raw materials by Chemclene;
8. Sale of services (such as waste sampling or transport services) by Chemclene to customers; and
9. Charges by Chemclene for off-Site disposal of still-bottoms resulting from the on-Site processing of wastes.

B. Interpretation of Documents

1. Waste into the Site

Based upon its understanding of Chemclene's operations, EPA has assumed that any unit of waste shipped to the Site was just as likely to have become a contaminant in the environment as any other unit of waste.

In preparing the volumetric ranking, EPA has examined carefully the Site documents to determine which transactions indicate the shipment of waste to Chemclene, and to determine the volume of these shipments.

The majority of transactions reflected in the Summaries are documented by a Chemclene invoice. In many instances, however, there are other documents that reveal the

details of the transaction more clearly than the invoice. For most transactions, the nature of the transaction is clear regardless of which document is examined. However, in some cases the nature of the transaction becomes clear only by comparing two or more documents. In all instances, EPA looked at all of the documents related to a transaction before determining how to interpret the documents.

2. Time Period Summarized

For purposes of preparing the VRS, EPA reviewed and summarized existing Site documents, which refer to the 1968 to 1992 time period. EPA is aware that Chemclene operations at the Site commenced in approximately 1952. However, since EPA does not have information relating to the 1952 to 1968 period of Chemclene operations, EPA has made no assumptions regarding waste transactions during that time period, and has not attempted to summarize waste transactions during that time period. Available information indicates that Chemclene withdrew its Part B Application submitted pursuant to the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6901 *et seq.*, to operate as a treatment and storage facility, and stopped accepting waste solvent for reclamation in July 1992.

3. Main Plant Area and Former Disposal Area

Information available to EPA indicates that Chemclene utilized both the MPA and FDA as part of Chemclene's operations. At all times during its operation, until approximately July 1992, Chemclene utilized the MPA to receive, accumulate, store, and process wastes, including hazardous substances. All wastes sent to the Site initially went to the MPA. Wastes, including hazardous substances, also were released and disposed of at the MPA as a result of Chemclene's operations. Chemclene also disposed of wastes, including hazardous substances, at the FDA. Chemclene claims that disposal at the FDA ceased when new management took over the business in approximately August 1975, at which point Chemclene discontinued use of the FDA and disposed of waste generated from the reclamation process off-Site.

Based upon the foregoing information, when preparing the volumetric ranking summaries for the Site, EPA counted all waste transactions between Chemclene and PRPs during the 1968 to August 1975 time period as waste into both the MPA and the FDA. EPA has counted waste transactions between Chemclene and PRPs after August 1, 1975, only as waste into the MPA.

The distinction between the MPA and the FDA is meaningful in two ways: a) in the setting of the cut-off delineating which PRPs may be eligible to participate in a *de minimis* settlement; and b) in determining the amount of monies eligible *de minimis* PRPs will be required to pay in order to participate in a *de minimis* settlement with EPA.

Each PRP's eligibility for *de minimis* status will be determined using the percentage of the total waste sent to the Site by the PRP. This percentage is set forth in the

"MPA %" column of the Summaries, since all waste into the Site was received and processed by Chemclene at the MPA.

The Site remedy selected by EPA in its Record of Decision dated November 26, 1997, has provided for distinct remedies for the MPA and FDA. Even though significant aspects of the cleanup of the MPA and the FDA may be combined, EPA believes that costs of the remedy can be allocated fairly between the two areas. EPA separately has calculated the *de minimis* settlement payments of each eligible *de minimis* PRPs for the MPA and FDA and has added these amounts to obtain a "Total Payment" required.

4. Transshipments

Based upon EPA's understanding of Chemclene's operations and review of Site records, EPA has determined that some waste received by Chemclene at the Site likely was transhipped off-Site, e.g. shipped off-Site for processing and/or disposal. Information available to EPA indicates that Chemclene often would containerize and store at the Site these wastes for off-Site shipment at some later date, and that releases or threatened releases of these wastes at the Site occurred as a result of Chemclene's practice.

EPA did not count as waste into the Site, transactions that appear to reflect that waste was sent off-Site for processing or disposal *only* in those instances where EPA could document, typically through its review of waste manifests, that such wastes remained in their original shipping containers and were not bulk-stored or otherwise opened and handled on-Site, prior to off-Site shipment.

C. Units of Measurement

To the extent applicable, EPA has prepared the volumetric ranking in accordance with OSWER Directive 9835.16, "Guidance to Preparing and Releasing Waste-In Lists and Volumetric Rankings to PRPs Under CERCLA," dated February 22, 1991. The most common unit of shipment was the 55-gallon drum, and therefore all other units found in the documentation were converted to 55-gallon drum units. When units were listed in gallons or other units of volume, simple mathematics was used to convert into drum units. For those entries with less than 55 gallons, a decimal was used. For example, if the documents indicated ten 30-gallon containers of waste shipped to Chemclene, then the 300 gallons of waste would be divided into 55-gallon units yielding 5.45 drums.

In a comparatively few instances, shipments of waste were listed in units of weight or other units. In these instances EPA used the following assumptions:

- For those entries listing pounds as the measurement unit, EPA's standard conversion factor of 1 gallon = 8.33 pounds was extrapolated to 55 gallons = 458 pounds.

- 1 can = 5 gallons.
- 1 bottle = 1 gallon.
- 1 lab pack = 1 gallon.

In addition, a small number of transactions indicated the shipment to Chemclene of "empty" drums or other containers which are listed as "used" or "dirty" or some other language indicating that the container had at one time contained waste. In these instances EPA assumed that the container contained 3% of its capacity in hazardous wastes, based upon the definition of "empty" in the RCRA regulations. See 40 C.F.R. § 261.7.

D. Brokers/Transporters

As a result of its review of Site documents, EPA has identified a number of PRPs that appear to have acted as brokers and/or transporters of waste to the Site. EPA has included broker/transporter PRPs in the Summaries.

Most Site records that identify brokers/transporters refer to brokers/transporters with whom it appears Chemclene dealt directly. A number of Site records, for example, reflect that Chemclene directly billed and/or credited such brokers/transporters with regard to waste transactions at the Site.

The Site records that refer to broker/transporter PRPs identify two types of transactions: 1) transactions in which a broker/transporter appears to have arranged for the transport or disposal of or transported waste generated by a third-party to the Site, and in which both the broker/transporter and the generator are expressly identified in the corresponding Site record; and 2) transactions between a broker/transporter and Chemclene where no third-party generator has been identified. In the latter instance the documentation is the same as for any other generator, and the party listed on the documentation is thus treated as a generator for those transactions, even if the same party may have acted as a broker/transporter in other instances.

Consistent with OSWER Directive 9835.16, whenever a Site record reflects a transaction in which both a generator PRP and a broker/transporter PRP are expressly identified, EPA has attributed the waste volume referred to in each such transaction to both the generator and the broker/transporter for purposes of compiling waste-in information contained in the Summaries. However, EPA has counted the total waste referred to in these transactions only once for purposes of determining total waste contributed to the Site by all PRPs.

The Generator VRS summarizes waste volume information: 1) for each generator PRP; and 2) for each broker/transporter PRP only with regard to those broker/transporter transactions with Chemclene for which no corresponding third-party generator has been identified. As set forth above, in cases where a third-party generator is not identified, the party named on the

invoice or other documentation has been treated as a generator for that transaction even if the party involved has been identified as a broker/transporter for other transactions.

The total waste contributed to the Site by all PRPs appears at the end of the Generator VRS.

EPA has prepared a separate Broker/Transporter VRS in order to summarize those waste-in transactions in which both a broker/transporter and a generator have been identified. The waste volume reflected in these transactions also has been summarized for each corresponding generator in the Generator VRS. By preparing a separate Broker/Transporter VRS, EPA can attribute to each broker/transporter the waste reflected in these transactions, but avoid double-counting the waste when determining total waste contributed to the Site by all Site PRPs (as reflected in the Generator VRS).

Broker/transporter PRPs should refer to both the Generator VRS and the Broker/Transporter VRS in order to determine waste volume and percentage information.

For purposes of a *de minimis* settlement, both the generator and the broker/transporter will be liable for the full amount of the waste in a transaction involving both a generator and a broker/transporter. In other words, for some shipments two parties both will be fully liable for the share of the cleanup represented by those drums. However, parties can avoid full liability if the broker/transporter and the generator cooperate with each other and agree to an allocation between themselves. In such instances, the broker/transporter and the generator may *jointly* settle with EPA for the full amount of the wastes in question, and avoid having to *each* pay for the wastes.

E. Grouped PRPs

Based upon information obtained by EPA, EPA has concluded that some Site PRPs are related or successor entities to other Site PRPs. EPA has grouped related/successor entities in the attached Summaries. For each such grouping, EPA has determined the grouping's total volume and percentage liability at the Site based upon the combined totals of each related/successor entity. Total volume and percentage information for each grouping is set forth in the Generator VRS that is arranged alphabetically by PRP. Total volume and percentage information for each grouping is set forth under the name of the PRP grouping and appears in bold print. Volume and percentage information for each separate related/successor PRP member of the grouping also is set forth in the Summaries.

F. Orphan PRPs

When a PRP is unable to pay all or part of its allocated share of a cleanup, EPA may allocate such a share among the viable PRPs in the same ratio as other cleanup costs. Pursuant to EPA's "Orphan Share" policies, EPA, under certain circumstances, may pay (from the

Superfund) a portion of the shares of PRPs that are completely non-viable. Orphan share funding may be available only to PRPs that agree to implement and fund remedial actions at a site, and not to *de minimis* PRPs. *De minimis* PRPs may be asked to pay on a *pro rata* basis for any shares for which the orphan PRPs are unable to pay. In addition, the *de minimis* premium will take into consideration the likelihood that additional such shares will be identified subsequent to the conclusion of the *de minimis* settlement.

When EPA has been able to identify a PRP as an orphan in the attached summaries, EPA has included for each such PRP, total volume and percentage information. EPA does not anticipate that Site orphans will participate in the *de minimis* settlement or otherwise pay monies towards Site remediation. Therefore, EPA has not included payment information for any Orphan. In addition, EPA has revised each non-Orphan PRP percentage ("Revised FDA %" and "Revised MPA %"), reflecting each non-orphan PRPs *pro rata* payment share for each Site orphan.

The calculation of the revised percentages has been done on a transaction by transaction basis. If a transaction involves an orphan generator, then the transaction was checked to determine if there was a broker/transporter for the same transaction. A transaction has been divided on a *pro rata* basis among the remaining PRPs only if there is *neither* a viable generator *nor* a viable broker/transporter for the transaction.

III. *DE MINIMIS* SETTLEMENT

A. *De Minimis* Cutoff

EPA has established a cut-off for *de minimis* settlement eligibility using a percentage of the total waste sent to the Site by the PRP. A PRP is eligible to participate in a *de minimis* settlement if its volumetric contribution of hazardous substances to the Site is at or less than 0.75% of the total volume attributed to the MPA. Pre-August 1975 percentages that have been assigned for the FDA have not been considered by EPA when establishing the *de minimis* settlement eligibility cutoff. However, such percentages have been considered by EPA when determining the amount of money each *de minimis* PRP will be asked to pay if it desires to settle.

EPA has also established a *de micromis* cutoff at 1.5 drums or less. EPA does not foresee a need for settlements with *de micromis* parties. EPA will, however, pursue settlements with *de micromis* parties if there is a threat of, or an actual suit by, other PRPs at the Site.

B. *De Minimis* Payments

The attached Summaries contain *de minimis* settlement payment information for each eligible *de minimis* settlement. EPA has divided the costs of the selected remedy, as set forth in the ROD, between the MPA and FDA, and has determined each *de minimis* PRP's required settlement payments for each of these areas of the Site. A PRP's required *de minimis* payment is

determined based upon its revised percentages for the FDA and the MPA. These revised percentages are then applied to the total costs estimates for the MPA and the FDA.

As of June 17, 1997, EPA incurred approximately \$2,214,705.00 in response costs ("Past Response Costs") at or in connection with the Site. Since EPA incurred the Past Response Costs as a result of activities that pertained to both the FDA and MPA, EPA has attributed one-half (\$1,107,352.00) of the Past Response Costs to FDA costs and the other one-half (\$1,107,352.00) to MPA costs. EPA has estimated future Site costs associated with cleanup and EPA oversight of the Site to be approximately \$15,729,151.00 (\$15,529,151.00 in remedial costs; \$200,000.00 in EPA remedial oversight). Of that amount, approximately \$8,155,725.00 has been attributed by EPA to cleanup of the FDA (\$8,055,725.00 in remedial costs; \$100,000.00 in EPA remedial oversight). Future costs associated with cleanup and EPA oversight of the MPA are approximately \$7,573,426.00. (\$7,473,426.00 in remedial costs; \$100,000.00 in EPA remedial oversight).

EPA has assessed a premium, which each *de minimis* PRP must pay in addition to each PRP's percentage of FDA and MPA costs, in order to participate in the *de minimis* settlement with EPA. The premium is intended to take into account a number of Site factors and risks, including additional remedial action and potential response cost overruns, that EPA may encounter when settling with *de minimis* PRPs. EPA has established a premium of 50% in this matter, i.e. a multiplier of .50.

Enclosure F
Comprehensive Mailing List of All Site PRPs

09/15/2000
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Malvern TCE Comprehensive Mailing List

Page 1 of 44
7/30/03

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7/30/03

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ORIGINAL
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Malvern TCE Comprehensive Mailing List

Page 5 of 44
7/30/03

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Malvern TCE Comprehensive Mailing List

Page 7 of 44
7/30/03

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Page 8 of 44
7/30/03

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Malvern TCE Comprehensive Mailing List

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Malvern TCE Comprehensive Mailing ListPage 11 of 44
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ORIGINAL
7/30/03

Malvern TCE Comprehensive Mailing List

Page 13 of 44
7/30/03

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Malvern TCE Comprehensive Mailing List

Page 14 of 44
7/30/03

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Original
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7/30/03

Malvern TCE Comprehensive Mailing List

Page 15 of 44
7/30/03

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7/30/03

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Malvern TCE Comprehensive Mailing List

Page 17 of 44
7/30/03

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Malvern TCE Comprehensive Mailing List

Page 18 of 44
7/30/03

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Malvern TCE Comprehensive Mailing List

Page 19 of 44
7/30/03

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Malvern TCE Comprehensive Mailing List

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7/30/03

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Malvern TCE Comprehensive Mailing List

Page 21 of 44
7/30/03

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Malvern TCE Comprehensive Mailing List

Page 22 of 44
7/30/03

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Malvern TCE Comprehensive Mailing List

Page 23 of 44
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Malvern TCE Comprehensive Mailing List

Page 27 of 44
7/30/03

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Malvern TCE Comprehensive Mailing ListPage 31 of 44
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Malvern TCE Comprehensive Mailing List

Page 33 of 44
7/30/03

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Malvern TCE Comprehensive Mailing List

Page 34 of 44
7/30/03

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Malvern TCE Comprehensive Mailing List

Page 35 of 44
7/30/03

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Page 37 of 44
7/30/03

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Page 38 of 44
7/30/03

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Malvern TCE Comprehensive Mailing List

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7/30/03

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Malvern TCE Comprehensive Mailing List

Page 41 of 44
7/30/03

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Page 42 of 44
7/30/03

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Malvern TCE Comprehensive Mailing List

Page 43 of 44
7/30/03

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Malvern TCE Comprehensive Mailing List

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7/30/03

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ORIGINAL
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Enclosure H
Small Business Regulatory and
Enforcement Fairness Act Information Sheet

ORIGINAL
(Red)



Office of Enforcement and Compliance Assurance **INFORMATION SHEET**

U.S. EPA Small Business Resources

If you own a small business, the United States Environmental Protection Agency (EPA) offers a variety of compliance assistance and tools to assist you in complying with federal and State environmental laws. These resources can help you understand your environmental obligations, improve compliance and find cost-effective ways to comply through the use of pollution prevention and other innovative technologies.

EPA Websites

EPA has several Internet sites that provide useful compliance assistance information and materials for small businesses. Many public libraries provide access to the Internet at minimal or no cost.

EPA's Small Business Home Page (<http://www.epa.gov/sbo>) is a good place to start because it links with many other related websites. Other useful websites include:

EPA's Home Page
<http://www.epa.gov>

Small Business Assistance Programs
<http://www.epa.gov/ttn/sbap>

Compliance Assistance Home Page
<http://www.epa.gov/oeca/oc>

Office of Site Remediation Enforcement
<http://www.epa.gov/oeca/osre>

Hotlines, Helplines and Clearinghouses

EPA sponsors approximately 89 free hotlines and clearinghouses that provide convenient assistance on environmental requirements.

EPA's Small Business Ombudsman Hotline can provide a list of all the hot lines and assist in determining the hotline best meeting your needs. Key hotlines include:

EPA's Small Business Ombudsman
(800) 368-5888

**Hazardous Waste/Underground Tanks/
Superfund**
(800) 424-9346

National Response Center
(to report oil and hazardous substance spills)
(800) 424-8802

Toxics Substances and Asbestos Information
(202) 554-1404

Safe Drinking Water
(800) 426-4791

**Stratospheric Ozone and Refrigerants
Information**
(800) 296-1996

Clean Air Technical Center
(919) 541-0800

Wetlands Hotline
(800) 832-7828

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U.S. EPA SMALL BUSINESS RESOURCES

Compliance Assistance Centers

In partnership with industry, universities, and other federal and state agencies, EPA has established national Compliance Assistance Centers that provide Internet and "faxback" assistance services for several industries with many small businesses. The following Compliance Assistance Centers can be accessed by calling the phone numbers below and at their respective websites:

Metal Finishing

(1-800-AT-NMFRC or www.nmfrc.org)

Printing

(1-888-USPNEAC or www.pneac.org)

Automotive Service and Repair

(1-888-GRN-LINK or www.ccar-greenlink.org)

Agriculture

(1-888-663-2155 or www.epa.gov/oeca/ag)

Printed Wiring Board Manufacturing

(1-734-995-4911 or www.pwbrc.org)

The Chemical Industry

(1-800-672-6048 or www.chemalliance.org)

The Transportation Industry

(1-888-459-0656 or www.transource.org)

The Paints and Coatings Center

(1-800-286-6372 or www.paintcenter.org)

State Agencies

Many state agencies have established compliance assistance programs that provide on-site and other types of assistance. Contact your local state environmental agency for more information. For assistance in reaching state agencies, call EPA's Small Business Ombudsman at (800)-368-5888 or visit the Small Business Environmental Homepage at <http://www.smallbiz-enviroweb.org/state.html>.

Compliance Incentives

EPA provides incentives for environmental compliance. By participating in compliance assistance programs or voluntarily disclosing and promptly correcting violations, businesses may be eligible for penalty waivers or reductions. EPA has two policies that potentially apply to small businesses: The Audit Policy (<http://www.epa.gov/oeca/auditpol.html>) and the Small Business Policy (<http://www.epa.gov/oeca/>

[smbusi.html](http://www.epa.gov/oeca/smbusi.html)). These do not apply if an enforcement action has already been initiated.

Commenting on Federal Enforcement Actions and Compliance Activities

The Small Business Regulatory Enforcement Fairness Act (SBREFA) established an ombudsman ("SBREFA Ombudsman") and 10 Regional Fairness Boards to receive comments from small businesses about federal agency enforcement actions. The SBREFA Ombudsman will annually rate each agency's responsiveness to small businesses. If you believe that you fall within the Small Business Administration's definition of a small business (based on your Standard Industrial Code (SIC) designation, number of employees or annual receipts, defined at 13 C.F.R. 121.201; in most cases, this means a business with 500 or fewer employees), and wish to comment on federal enforcement and compliance activities, call the SBREFA Ombudsman's toll-free number at 1-888-REG-FAIR (1-888-734-3247).

Your Duty to Comply

If you receive compliance assistance or submit comments to the SBREFA Ombudsman or Regional Fairness Boards, you still have the duty to comply with the law, including providing timely responses to EPA information requests, administrative or civil complaints, other enforcement actions or communications. The assistance information and comment processes do not give you any new rights or defenses in any enforcement action. These processes also do not affect EPA's obligation to protect public health or the environment under any of the environmental statutes it enforces, including the right to take emergency remedial or emergency response actions when appropriate. Those decisions will be based on the facts in each situation. The SBREFA Ombudsman and Fairness Boards do not participate in resolving EPA's enforcement actions. Also, remember that to preserve your rights, you need to comply with all rules governing the enforcement process.

EPA is disseminating this information to you without making a determination that your business or organization is a small business as defined by Section 222 of the Small Business Regulatory Enforcement Fairness Act (SBREFA) or related provisions.